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November 20, 2001

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s Operations Support Systems with State and Federal Regulations*
Docket No. 01-00362

Dear Mr. Waddell:

Enclosed please find the original and thirteen copies of AT&T Communications of the South Central States, Inc. and TCG MidSouth, Inc.'s Rebuttal Testimony of Jay M. Bradbury and Sharon E. Norris in the above referenced matter. Copies are being served on all known parties of record.

Very truly yours,

Jack W. Robinson, Jr.

Attorneys for AT&T Communications of the South Central States, Inc. and TCG MidSouth, Inc.

JWRjr/ghc

cc: All parties of record

171726.2

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Rebuttal Testimony of Jay M. Bradbury and Sharon E. Norris on behalf of AT&T Communications of the South Central States, Inc. and TCG MidSouth, Inc. was served via hand-delivery to the following parties, except for Terry Monroe and Fred J. McCallum and Lisa Foshee, which were mailed via first class U.S. mail postage-prepaid, this 20th day of November, 2001:

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171726.2

BEFORE THE TENNESSEE REGULATORY AUTHORITY

REBUTTAL TESTIMONY OF JAY M. BRADBURY

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AND TCG MIDSOUTH, INC.

DOCKET NO. 01-00362

NOVEMBER 20, 2001

BACKGROUND

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Jay M. Bradbury. My business address is 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309.

Q. PLEASE DESCRIBE YOUR CURRENT POSITION AND RESPONSIBILITIES.

A. I am a District Manager in the AT&T Law and Government Affairs organization, and I provide consulting support to AT&T's business units and other internal organizations. Specifically, I am involved in the negotiation and implementation of interfaces for operational support systems ("OSS") necessary to support AT&T's entry into the local telecommunications market.

Q. ARE YOU THE SAME JAY M. BRADBURY THAT PREVIOUSLY FILED DIRECT TESTIMONY IN THIS DOCKET ON OCTOBER 22, 2001?

A. Yes, I am.

Q. WHAT IS PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to explain that BellSouth OSS are not truly regional and that material differences in BellSouth's OSS performance can and do exist from state-to-state. I show how my direct testimony on this issue is supported by the filed testimony of BellSouth's witnesses, Ronald M. Pate, Alfred Heartley, Ken L. Ainsworth, and David P. Scollard.

REGIONALITY

Q. IN YOUR DIRECT TESTIMONY YOU PROVIDED AN EXPLANATION OF "REGIONALITY" AND A DISCUSSION OF ITS APPLICATION TO THE COMMISSION'S TASK IN THIS DOCKET. HOW DOES BELLSOUTH'S TESTIMONY RELATE TO YOUR DISCUSSION?

A. BellSouth's testimony confirms that its OSS are only partially regional.

Exhibit JMB-R1 provides a high level overview of the relative levels of regionality present in the OSS that BellSouth describes in its direct testimony. This exhibit (and the related but more detailed Exhibits JMB-R2 through JMB-R7) provide a framework for analysis of the testimony on OSS regionality being provided in this docket. The more detailed exhibits also include third party

testing assessments. Those assessments, like the third party tests themselves, are snap shots in time and do not take into account the OSS changes that BellSouth implements on a regular basis.

Exhibit JMB-R1 uses shading to depict the relative level of regionality for the major OSS components (e.g., systems, a processes, work groups, methods & procedures, documentation, etc.) that support each of the five core OSS processes (Pre-ordering, Ordering, Provisioning, Billing, and Maintenance and Repair). Darkly shaded cells represent components with relatively high levels of regionality, cells with medium shading represent components with a moderate level of regionality, and lightly shaded cells represent components with low levels of regionality.

I have grouped the OSS components in each core process to depict whether that component is (1) a front-end interface (Gateway), (2) a legacy system, or (3) a linkage between interfaces and legacy systems. Legacy systems may be either electronic or manual, and linkages may be software, physical, or manual.

Finally, I have provided an overall, or total, relative ranking for each of the five processes. As you can seek the relative regionality for pre-ordering, provisioning and maintenance and repair is low, while the ranking for ordering and billing is moderate. The overall process ratings are impacted by the "weakest link," "function / sub-function," and "level of manual processing" concepts discussed in my direct testimony because the functions are interdependent. For example,

provisioning a wholesale service or element accurately and timely is dependent in part on completing the ordering function quickly and correctly, which in turn is dependent in part on obtaining timely and accurate pre-ordering information. Thus, errors in one area may manifest themselves in other areas. Accordingly, the regionality of the end-to-end transaction is affected by the regionality of each process that supports that transaction.

PROCESS REVIEWS

PRE-ORDERING FUNCTIONS

Q. WHAT ARE PRE-ORDERING FUNCTIONS?

A. Pre-ordering functions are those activities through which a CLEC or BellSouth obtains the necessary information to place a service order. These functions include, but are not limited to validating street addresses, assigning telephone numbers, obtaining product/service information, obtaining due dates, obtaining loop make-up information, and accessing customer service records. Many pre-ordering functions can be performed electronically, but some must be performed manually.

Q. WAS PRE-ORDERING TESTED IN THE GEORGIA AND FLORIDA THIRD PARTY TESTS?

A. Yes. Pre-ordering functions performed through the TAG front-end interface were tested in both Georgia and Florida. Pre-ordering functions performed through the

LENS front-end interface, however, was tested only in Florida. As explained below, however, the components that support pre-ordering functions in Georgia and Florida are different than the components used to support pre-ordering functions in Tennessee. Thus, the Tennessee pre-ordering components were not actually tested in Florida or Georgia.

Exhibit JMB-R2 lists the OSS components associated with pre-ordering. It indicates the component's individual relative level of regionality, provides an indication of whether or not that component was subject to test in Georgia and Florida, and shows whether or not the component tested is substantially similar to the component that is used in Tennessee.[1]

Q. IS THERE INFORMATION ABOUT THE PRE-ORDERING OSS COMPONENTS REFLECTED IN EXHIBIT JMB-R2 THAT YOU WOULD LIKE TO HIGHLIGHT TO THE TRA?

A. Yes. There are a number of facts concerning the pre-ordering components listed in this exhibit that I believe will be of value to the TRA.

- **Industry Standard** – there are currently two industry standards that apply to pre-ordering and ordering OSS. The Georgia test examined the oldest, Telecommunications Committee Industry Forum – 7 ("TCIF-7"), which is currently used on less than 20% of all CLEC transactions in BellSouth's

[1] The format of this exhibit is repeated for exhibits supporting subsequent discussions each of the other core OSS processes.

states. The more current standard shown as TCIF-9/10 and commonly referred to as OSS99 was tested in Florida, but was not tested in Georgia.[2]

- **LENS** – LENS was not subject to test in Georgia but has been tested broadly in Florida.
- **Navigator Contracts** – The navigator contracts that link the front-end interfaces with the back-end legacy systems offer certain functionality in some states that are not available in others.
- **Account Team and LCSC** – These components perform as both "manual linkage" and "manual legacy" systems and I have assigned each of them a "split" rating. BellSouth has many account teams and three LSCSs. BellSouth assigns account teams and LCSC responsibility on a CLEC basis. Thus, the account team and LCSC provide regional support to a particular CLEC. CLECs, however, have different account teams and are supported by different LCSCs. In addition, account teams and the LCSC often must rely on other BellSouth work groups that are geographically based to perform their manual functions.
- **Electronic Legacy Systems** – As discussed on pages 10 through 12 of my direct testimony, these systems are not regional for two main reasons: (1) the data within these systems differ by geography; and (2) different physical systems are used to support different states. In addition, the connectivity to the different physical systems through BellSouth's wide area network is unique to transactions for each state.

[2] BellSouth introduced OSS99 into production in January 2000, some 15 months before the completion of the Georgia test in March, 2001.

- **OSP Engineering** – As discussed in Mr. Pate's testimony (Pate Direct pp 101-107), the Outside Plant Engineering department in Tennessee does not have any outside plant facility information residing in the Corporate Facilities Database ("CFD") as exists for Georgia and Florida. Thus reliance upon manual processing of loop make up queries is higher in Tennessee and will remain so for a considerable time into the future.

ORDERING FUNCTIONS

Q. WHAT ARE ORDERING FUNCTIONS?

A. Ordering functions are those activities through which a CLEC or BellSouth submits a service order and that order is processed to be ready for provisioning. Ordering also includes all attendant notifications such as firm order confirmations, rejection notices, and jeopardy notices. CLECs can submit electronic orders for some products and services, but must submit manual orders for others. Even when CLECs submit accurate electronic orders, however, BellSouth processes a large percentage of these orders manually because of BellSouth system design or BellSouth system error.

Q. WAS ORDERING TESTED IN THE GEORGIA AND FLORIDA THIRD PARTY TESTS?

A. Yes. As discussed in the testimony of Ms. Sharon E. Norris the testing of the ordering function conducted in Florida was much broader in scope than the testing in Georgia. The testing in both states, moreover, did not test always test the same OSS components used to support ordering functions in Tennessee. Exhibit JMB-

R3 presents information on the OSS components associated with ordering in the same manner as Exhibit JMB-R2 did for pre-ordering. In addition, as explained above, the ordering function is interdependent on the pre-ordering function and is impacted by the relatively low level of regionality of that function.

Q. IS THERE INFORMATION ABOUT THE ORDERING OSS COMPONENTS REFLECTED IN EXHIBIT JMB-R3 THAT YOU WOULD LIKE TO HIGHLIGHT TO THE TRA?

A. Yes.

- **Manual Gateway / LCSC** – The LCSC serves as the receipt point for manually submitted orders and as the manual linkage for these orders to SOCS the principle electronic legacy system in the ordering process. Approximately 10 percent of all LSRs are submitted manually. The LCSC also provides the manual processing associated with electronically submitted orders that fall out because of BellSouth's design decisions (approximately 8 percent of all LSRs), the failure of BellSouth's ordering software linkages to perform as designed (approximately _9 percent of all LSRs), and CLEC input errors not automatically discovered by the linkage systems (approximately 3 percent of all LSRs). In total approximately one third of all CLEC orders encounter manual processing. Orders processed in the LCSC for customers in Tennessee are processed using SONGS. SONGS has not been tested by either the Georgia or Florida third party tests. Also, the "psuedo CLEC" in both the Georgia and Florida third party tests were supported by the Atlanta LCSC and a hand-picked account team.

- **Software Linkages Programming**– There are three different technology platforms for the processing of (1) non-LNP orders (2) orders with LNP and (3) orders involving xDSL. All three are included in the Florida test, but only the first two were included in the Georgia test.
- **Gateway / Software Linkages Performance** - Absent state specific flow through data, there is no quantitative evidence to evaluate the regionality of BellSouth's gateway/software linkage performance.

PROVISIONING FUNCTIONS

Q. WHAT ARE PROVISIONING FUNCTIONS?

A. Provisioning functions are those activities through which BellSouth installs the actual products and services ordered. While BellSouth uses a number of electronic systems in the provisioning process, provisioning is heavily dependent on manual processes performed along geographic lines.

Q. WAS PROVISIONING TESTED IN THE GEORGIA AND FLORIDA THIRD PARTY TESTS?

A. Yes. As is discussed in the testimony of Ms. Sharon E. Norris the testing of the provisioning function in Florida was much broader in scope than the testing in Georgia. The testing in both states, moreover, did not test always test the same OSS components used to support provisioning functions in Tennessee. Exhibit JMB-R4 presents information on the OSS components associated with provisioning in the same manner as Exhibit JMB-R2 did for pre-ordering.

CLECs do not have a front-end interface or gateway to the provisioning process. As BellSouth's witness Mr. Alfred Heartley notes in his direct testimony the provisioning process "begins with an order leaving the Service Order Communications System ("SOCS") (whether submitted electronically or manually) and ends when the order is completed." (Heartley Direct page 15). All CLEC interaction with BellSouth during the provisioning process is manual.

Q. IS THERE INFORMATION ABOUT THE PROVISIONING OSS COMPONENTS REFLECTED IN EXHIBIT JMB-R4 THAT YOU WOULD LIKE TO HIGHLIGHT TO THE TRA?

A. Yes. Provisioning is the process with the absolute lowest relative level of regionality. All provisioning is local. Each location has different physical plant, different personnel, different management, different budget, different priorities, and different circumstances. While BellSouth claims it has a common organizational structure and has uniform procedures throughout its region, it readily acknowledges that performance levels can and do differ substantially from state-to-state. Thus, BellSouth's OSS cannot possibly be considered "regional" for the purpose of relying on out-of--state data (either test results or performance data based on commercial usage).

- **Software Linkages** – as discussed above, CLECs have no front-end interface to this process, instead, SOCS an electronic legacy system in the ordering process serves as a software linkage in the provisioning system along with SOAC and the NSDB. BellSouth's witness Mr. Alfred Heartely lists the NSDB on page 13 of his direct testimony along with a brief description. No

other information has been provided about this system. This component has a moderate level of regionality like SOCS and SOAC and the specific configuration serving Tennessee has not been tested.

- **CWINS** – I have shown this center, which is unique to the CLEC process, as both a manual linkage and a manual legacy work group. While the concept of a centralized center to support CLEC provisioning across all nine states may be viewed as a convenience for CLECs, that convenience also carries a cost. The CWINS is still dependent upon the individual BellSouth WMCs to manage the actual provisioning of CLEC orders within the WMCs geographical area. Thus the CWINS is an additional link in the chain of provisioning that does not exist for BellSouth as it provisions order for its own customers. Additional links mean additional potential process breakage points.
- **Manual Legacy / Electronic Legacy** – In the provisioning process, the controlling component is the manual legacy work group. The electronic legacy systems are tools used by manual legacy work to obtain data and manage work-load. This is exactly the reverse of the roles for these types of OSS components in the pre-ordering and ordering processes in which the electronic systems are controlling and primary and the manual work groups are secondary. In the pre-ordering and ordering processes, there are three principle manual work groups (two of which have moderate or high relative levels of regionaltiy). In the provisioning process, however, there are seven principle groups and six of them have low levels of relative regionality. The dominance of geographically distributed manual processes in provisioning

means that the causes of individual differences in performance are both harder to identify and harder to correct and may continue over extended periods of time.

BILLING FUNCTIONS

Q. WHAT ARE BILLING FUNCTIONS?

A. Billing functions are those activities through which BellSouth records, processes, and provides usage and billing data. It appears that BellSouth has largely (but not completely) automated the billing function.

Q. WAS BILLING TESTED IN THE GEORGIA AND FLORIDA THIRD PARTY TESTS?

A. Yes. As is discussed in the testimony of Ms. Sharon E. Norris the testing of billing functions conducted in Florida was much broader in scope than the testing in Georgia. The testing in both states, moreover, did not test always test the same OSS components used to support billing functions in Tennessee. Exhibit JMB-R5 presents information on the OSS components associated with billing in the same manner as Exhibit JMB-R2 did for pre-ordering. In addition, in Exhibit JMB-R6, I provide an overview of the billing process based upon testimony by BellSouth's witness Mr. David P. Scollard at hearing in Alabama in Docket No. 25835 on July 30, 2001.

In his testimony filed here in Tennessee Mr. Scollard notes that the billing processes are run in one of two separate billing centers (Scollard Direct page 27).

He does not point out, however, that within each of these data centers different and independent mainframe computers (referred to as Revenue Accounting Offices ("RAOs")) exist for each state, and in some cases for parts of a state. Exhibit JMB-R6 shows that seven RAOs reside in the Birmingham Data Center and five in the Charlotte Data Center. The Tennessee RAO, although it resides in the Birmingham data center along with the two Georgia RAOs, has not been subject to third party testing. In addition, a third Data Center, in Mississippi is involved in the distribution of daily usage files.

Q. IS THERE INFORMATION ABOUT THE BILLING OSS COMPONENTS REFLECTED IN EXHIBIT JMB-R5 THAT YOU WOULD LIKE TO HIGHLIGHT TO THE TRA?

A. Yes. While billing is largely automated, its overall relative level of regionality is moderate due to a high degree of state specific physical hardware and programming. Further, billing is another process to which the CLECs lack a front-end interface. All CLEC interaction with BellSouth to determine information about events in the billing process that may be impacting the CLEC or its customers is manual.

- **SOCS / Billing Group** – SOCS performs a linkage function. When SOCS receives a field or central office report that the provisioning of an order has been completed it sends the CLEC a completion notice, and the "Billing Group" a copy of the completed service order for editing an input to the CRIS, CABS and or BIBS billing systems. If all is well, the service order has been completed accurately, the subsequent update to these systems and others is

automatic and timely. If however the Billing Group, which is a manual legacy work center, determines there is an error in the service order a number of days may pass before the service order is manually corrected and the billing and other down stream systems are updated. The broader testing of this functionality in the Florida test has demonstrated that the level of performance within this group is not consistent.

- **Network Elements / Usage Collection and Identification** – Network elements that generate usage records are most commonly found in switching central offices and generally will result in the preparation of a daily usage file. There are over 1800 central offices in BellSouth's territory, approximately 200 in each state. While BellSouth undoubtedly strives to collect all usage data accurately because usage data can translates into revenue, reliable quantitative evidence is necessary to demonstrate that BellSouth's performance of the billing function is substantially the same from state-to-state.

- **Electronic Legacy Systems** – There are 12 RAOs each containing copies of the CRIS, CABS, and BIBS software and the unique records associated with the geography being served. RAOs typically serve a state except for Florida which has three and Georgia which has two. Again the TRA should not accept on faith alone that similar performance is being provided by 12 different groupings of systems. The implementation schedule for "Tapestry," discussed by Mr. Scollard in footnote 1 on page 27 of his direct testimony, has been delayed to dates yet to be determined.

- **Manual Legacy Work Groups** – Mr. Scollard's testimony only addresses the "Billing Group" and the "Rate Input Group". The other group is not within Mr. Scollard's organization and is described by Mr. Ainsworth on pages 86-98 of his direct testimony. Thus CLEC not only lack a front-end interface to the billing process, they also have no direct access to the process at all but must channel all requests for information through either the N&CS-CS Billing and Collections Group or their account team neither of which are directly in the process.

MAINTENANCE & REPAIR FUNCTIONS

Q. WHAT ARE MAINTENANCE AND REPAIR FUNCTIONS?

A. Maintenance and repair ("M&R") functions are those activities through which BellSouth keeps provisioned products and services in good working order. Like provisioning, while BellSouth uses a number of electronic systems in the M&R process, M&R is heavily dependent on manual processes performed along geographic lines. Indeed, maintenance and repair ultimately depends upon the exact same central office and field forces as provisioning and shares many faults with the provisioning process relative to regionality.

Q. WAS MAINTENANCE AND REPAIR TESTED IN THE GEORGIA AND FLORIDA THIRD PARTY TESTS?

A. Yes. However as is discussed in the testimony of Ms. Sharon E. Norris the testing of the maintenance and repair function conducted in Florida was much broader in

scope than the testing in Georgia. The testing in both states, moreover, did not test always test the same OSS components used to support maintenance and repair functions in Tennessee. Exhibit JMB-R7 presents information on the OSS components associated with maintenance and repair in the same manner as Exhibit JMB-R2 did for pre-ordering.

Q. IS THERE INFORMATION ABOUT THE MAINTENANCE AND REPAIR OSS COMPONENTS REFLECTED IN EXHIBIT JMB-R7 THAT YOU WOULD LIKE TO HIGHLIGHT TO THE TRA?

A. Yes. As in the provisioning process the CWINS plays a significant role in the maintenance and repair of services provided to CLECs and their customers serving as both a manual linkage and manual legacy work group and being dependent upon other geographically deployed BellSouth work forces. CWINS is an additional link in the chain service protection and restoration that does not exist for BellSouth. Additional links mean additional potential process breakage points.

CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. BellSouth has not provided any persuasive evidence that its OSS are regional. Rather, BellSouth simply provides bald assertions that its OSS are the same despite obvious physical differences in hardware, software, databases, personnel, network facilities and market conditions. Undoubtedly, BellSouth has attempted

to standardize its operations throughout its region. But the goal of the Authority's evaluation is not to determine the level of standardization. The purpose of Phase I of this docket is to determine whether BellSouth's OSS are sufficiently regional for it to be reasonable for the TRA to give substantial weight to out-of-state data (third party test results or performance data from commercial usage) in evaluating compliance with state and federal law.[3]

Here, BellSouth admits that despite its standardization efforts, its OSS performance can and does vary substantially from state-to-state. BellSouth, moreover, has not provided any quantitative evidence that: (1) its standardization efforts result in substantially the same performance throughout its region; or (2) the physical differences in its OSS components do not cause material differences in performance levels from state-to-state. In sum, BellSouth has not proven that its OSS are regional.

Q. DOES THAT CONCLUDE YOUR TESTIMONY?

A. Yes.

[3] Phase II of this docket will focus on whether the out-of-state data is reliable.

JMB - R1

RELATIVE LEVELS OF REGIONALITY – BELLSOUTH'S OSS FOR CLECS

Process	Pre-Ordering	Ordering	Provisioning	Billing	Mtce & Repair
OSS Component (System, Process, Work Group, Methods and Procedures, etc.)					
Gateway (Front-end Interface)	LENS & TAG	LENS, TAG & EDI	None	None	TAFI & ECTA
Software Linkages	Navigator Contracts	LEO/LESOG LNP/LAUTO CDG/SOG	SOCS SOAC NSDB	SOCS Network Elements Usage Collection	TAFI [illegible]
Physical Linkages	Wide Area Network	Wide Area Network	Wide Area Network	Wide Area Network	Wide Area Network
Manual Linkages	LCSC Account Team	LCSC Account Team	CWINS Account Team	Account Team	CWINS Account Team
Electronic Legacy Systems	RSAG ATLAS COFFI P/SIMS DSAP CRIS LFACS LQS	SOCS Pre-ordering legacy suite	LFACS COSMOS/SWITCH MARCH TIRKS WFA/DI WFA/DO WFA/C	CRIS CABS BIBS ("RAOs") Tapestry	LMOS WFA/DI WFA/DO WFA/C PREDICTOR MARCH CRIS
Manual Legacy Work Groups	Account Team LCSC OSP Engineering	Account Team LCSC OSP Engineering	CWINS AFIG CPG OSP Engineering WMC CO Operations I&M Forces	Billing Group Rate Input Group N&CS-CS Group	CWINS CO Operations I&M Forces WMC
Overall	Low	Moderate	Low	Moderate	Low

Exhibit JMB-R1

JMB - R2

Relative Regionality / Need for Testing BellSouth's CLEC OSS Process for:

Pre-Ordering

	Relative Regionality	Tested in Georgia	Tested in Florida	Tested As Used In Tennessee
OSS Component (System, Process, Work Group, Methods and Procedures, etc.)				
Industry Standard				
TCIF-7	H	Y	N	Y
TCIF-9/10	H	N	Y	Y
Gateway				
LENS	H	N	Y	Y
TAG	H	Y	Y	Y
Software Linkage				
LENS Navigator Contracts	L	N	Y	N
TAG Navigator Contracts	L	Y	Y	N
Physical Linkages				
Wide Area Network	L	Y	Y	N
Manual Linkage				
Account Team	H / L	N	Y	N
LCSC	M / L	N	Y	N
Electronic Legacy				
RSAG	L	Y	Y	N
ATLAS	L	Y	Y	N
COFFI	L	N	Y	N
P/SIMS	L	N	Y	N
DSAP	L	Y	Y	N
CRIS	L	Y	Y	N
LFACS	L	N	Y	N
LQS	L	N	Y	N
Manual Legacy				
Account Team	H / L	N	Y	N
LCSC	M / L	N	Y	N
OSP Engineering	L	Y	Y	N

Exhibit JMB-R2

Relative Regionality / Need for Testing
BellSouth's CLEC OSS Process for:

Ordering

	Relative Regionality	Tested in Georgia	Tested in Florida	Tested As Used In Tennessee
OSS Component (System, Process, Work Group, Methods and Procedures, etc.)				
Industry Standard				
TCIF-7	H	Y	N	Y
TCIF-9/10	H	N	Y	Y
Gateway				
LENS	H	N	Y	Y
TAG	H	Y	Y	Y
EDI	H	Y	Y	Y
Manual (Fax / email)	H	N	Y	N
Software Linkage				
LSRR	H	Y	Y	Y
LEO / LESOG	H	Y	Y	Y
LNP / LAUTO	H	Y	Y	Y
COG / SOG	H	N	Y	Y
Physical Linkages				
Wide Area Network	L	Y	Y	N
Manual Linkage				
Account Team	H / L	N	Y	N
LCSC	M / L	N	Y	N
• DOE	M	N	Y	NA
• SONGS	M	NA	NA	N
Electronic Legacy				
Pre-order suite	L	Y	Y	N
SOCS	M	Y	Y	N
Manual Legacy				
Account Team	H / L	N	Y	N
LCSC	M / L	N	Y	N
OSP Engineering	L	Y	Y	N

Exhibit JMB-R3

Relative Regionality / Need for Testing
BellSouth's CLEC OSS Process for:

Provisioning

	Relative Regionality	Tested in Georgia	Tested in Florida	Tested As Used In Tennessee
OSS Component (System, Process, Work Group, Methods and Procedures, etc.)				
Gateway	**CLECs have no front-end interface to this process**			
Software Linkage				
SOCS	M	Y	Y	N
SOAC	M	Y	Y	N
NSDB	M	Y	Y	N
Physical Linkages				
Wide Area Network	L	Y	Y	N
Manual Linkage				
CWINS	M / L	Y	Y	N
Electronic Legacy				
LFACS	L	Y	Y	N
COSMOS/SWITCH	L	Y	Y	N
MARCH	L	Y	Y	N
TIRKS	L	Y	Y	N
WFA/DI	L	Y	Y	N
WFA/DO	L	Y	Y	N
WFA/C	L	Y	Y	N
Manual Legacy				
CWINS	L	Y	Y	N
AFIG	L	Y	Y	N
CPG	L	Y	Y	N
OSP Engineering	L	Y	Y	N
WMC	L	Y	Y	N
CO Operations	L	Y	Y	N
I&M Forces	L	Y	Y	N

Exhibit JMB-R4

JMB - R5

Relative Regionality / Need for Testing
BellSouth's CLEC OSS Process for:

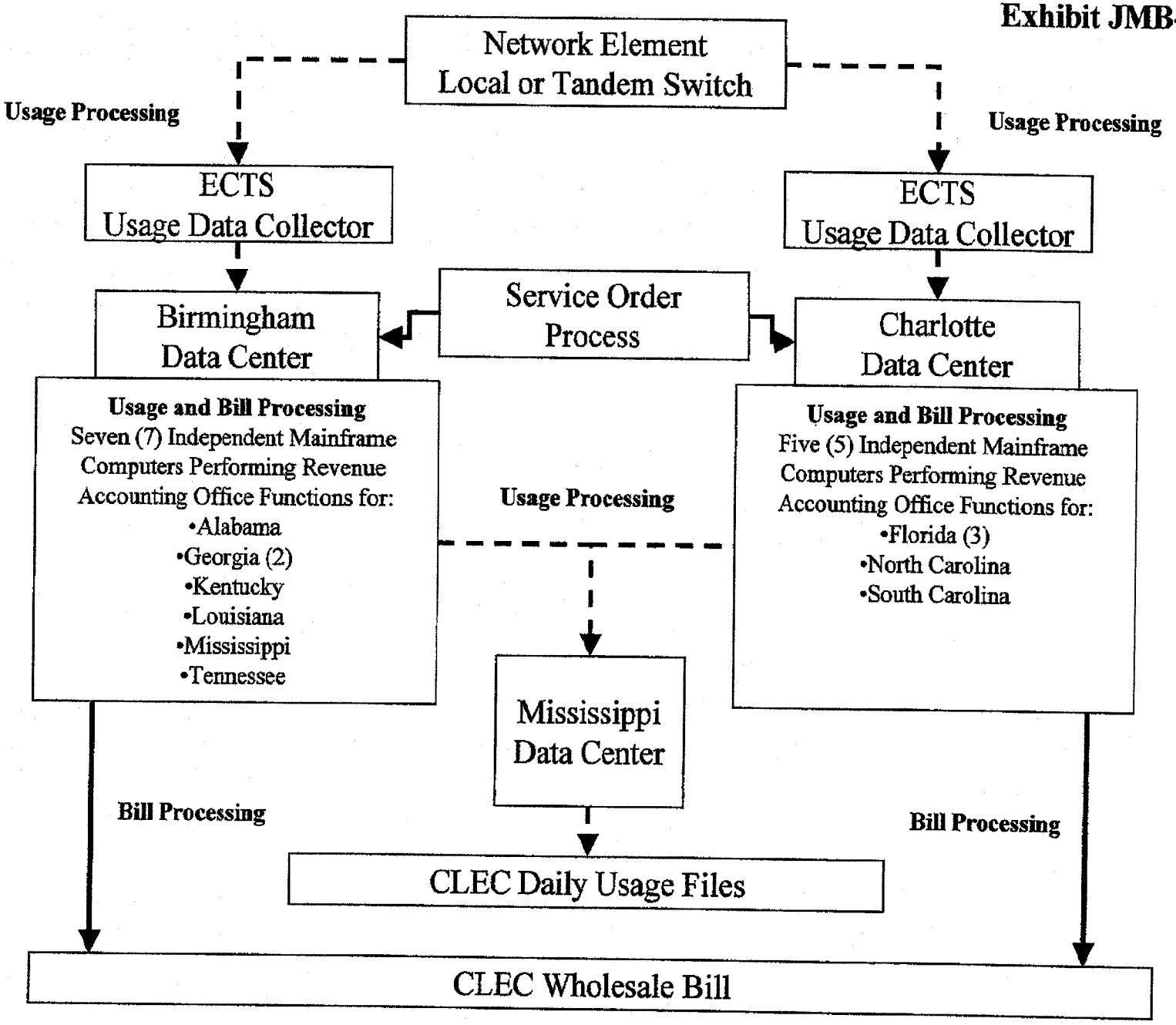
Billing

	Relative Regionality	Tested in Georgia	Tested in Florida	Tested As Used In Tennessee
OSS Component (System, Process, Work Group, Methods and Procedures, etc.)				
Gateway	**CLECs have no front-end interface to this process**			
Software Linkage				
SOCS	M	Y	Y	N
Network Elements (i.e. central office, etc.	M	Y	Y	N
Usage Collection and Identification	M	Y	Y	N
Physical Linkages				
Wide Area Network	L	Y	Y	N
Manual Linkage				
Account Team	H/L	N	Y	N
Electronic Legacy				
CRIS	M	Y	Y	N
CABS	M	Y	Y	N
BIBS	M	Y	Y	N
TAPESTRY	M	N	Y (Planned)	N
Manual Legacy				
Billing Group (SO edit and correction)	M	N	Y	N
Rate Input Group	M	N	Y	N
N&CS-CS Billing and Collections Group	M	N	Y	N

Exhibit JMB-R5

JMB - R6

Exhibit JMB-R6



Source - AL Docket No. 25835, July 30, 2001, Transcript and AT&T Hearing Exhibit 139

Relative Regionality / Need for Testing BellSouth's CLEC OSS Process for:

Maintenance and Repair

	Relative Regionality	Tested in Georgia	Tested in Florida	Tested As Used In Tennessee
OSS Component (System, Process, Work Group, Methods and Procedures, etc.)				
Gateway				
TAFI	H	Y	Y	Y
ECTA	H	Y	Y	Y
Telephone	H	Y	Y	Y
Software Linkage				
TAFI	M	Y	Y	N
Physical Linkages				
Wide Area Network	L	Y	Y	N
Manual Linkage				
CWINS	M / L	Y	Y	N
Electronic Legacy				
LMOS	L	Y	Y	N
WFA/DI	L	Y	Y	N
WFA/DO	L	Y	Y	N
WFA/C	L	Y	Y	N
PREDICTOR	L	Y	Y	N
MARCH	L	Y	Y	N
CRIS	L	Y	Y	N
Manual Legacy				
CWINS	L	Y	Y	N
CO Operations	L	Y	Y	N
I&M Forces	L	Y	Y	N
WMC	L	Y	Y	N

Exhibit JMB-R7

Exhibit JMB-R8
Cover Sheet

BellSouth's Exhibit OSS-69

Exhibit OSS-69

Matrix showing regionality of systems

APPLICATIONS/SYSTEMS/DATABASES

Electronic Interface Applications	CLECs' Databases	BellSouth OSS (shared by CLECs)	FUNCTION	SERVER Location(s)	STATE(s) Served by
EDI			Electronic Data Interchange - Computer to Computer exchange, Industry Standard. Enables CLECs to process Local Service Requests (ordering).	Birmingham, AL	All states are served by this location.
LENS			Local Exchange Navigation System - WEB Based GUI used by CLECS for entering Local Service Requests (pre-order and firm order).	Charlotte, NC	All states are served by this location.
TAG			Telecommunications Access Gateway – Client application programming interface used by CLECs (pre-order and order).	Tucker, GA Charlotte, NC & Birmingham, AL	All states for Internet access All states are served by each of these locations for LAN to LAN access.
	LAUTO		Local Number Portability Service Order Generator – Service order generator for LNP.	Charlotte, NC	All states are served by this location.
	LSRR		Local Service Request Router – Routes service requests from EDI, TAG or LENS to the Corporate Gateway based on request type.	Birmingham, AL	All states are served by this location.
	LEO		Local Exchange Ordering – Stores, forwards and edits data for electronic processing.	Birmingham, AL	All states are served by this location.
	LESOG		Local Exchange Service Order Generator – translates LSR into SOCS acceptable service order format.	Jackson, MS & Birmingham, AL	All states are served by each of the locations.
		SOCS	Service Order Communication System – Collects, stores and distributes service orders to all user departments, including service order-driven mechanized systems.	Birmingham, AL Charlotte, NC	KY, TN, MS, AL, LA, GA NC, SC, FL
		DOE	Direct Order Entry – used by LCSC to input manual orders.	Miami, FL Charlotte, NC Atlanta, GA	FL NC, SC GA

APPLICATIONS/SYSTEMS/DATABASES

Electronic Interface Applications	CLECs Databases	BellSouth OSS (shared by CLECs)	FUNCTION	SERVER Location(s)	STATE(s) Served
					Users in all states have to access the DOE box which serves a particular state
		SONGS	Service Order Negotiation Generation System – used by LCSC to input manual orders.	Birmingham, AL	AL, KY, LA, MS, TN
		ATLAS	Application For Telephone Number Load Administration Selection – Provides telephone numbers to negotiation systems.	Birmingham, AL Charlotte, NC	AL, KY, LA, MS, GA, TN FL, NC, SC
		RSAG	Regional Street Address Guide – Provides address-related information for service negotiation and service provisioning.	Birmingham, AL Charlotte, NC	KY, TN, MS, AL, LA, GA NC, SC, FL
		P/SIMS	Product/Services Inventory Management System – Products and services are kept per switch and supplied downstream (through COFFI) to negotiation systems.	Birmingham, AL	All states are served by this location.
		DSAP	DOE Support Applications - Supports due date assignment information for region-wide systems.	Birmingham, AL Charlotte, NC	GA, KY, TN, MS, AL,, LA FL, NC, SC
		CRIS	Customer Record Information System – Provides end user and CLEC account information.	Birmingham, AL Charlotte, NC	KY, TN, MS, AL, LA, GA FL, SC, NC
		LFACS	Loop Facilities Assignment and Control System – Used to assign service orders and maintain the inventory of outside plant in BellSouth.	Charlotte, NC Birmingham, AL	GA, SC, FL KY, LA, NC, AL, TN, MS

APPLICATIONS/SYSTEMS/DATABASES

Electronic Interface Applications	CLECs Databases	BellSouth OSS (shared by CLECs)	FUNCTION	SERVER Location(s)	STATE(s) Served
		LMOS FE	Loop Maintenance Operation System Front End – provides the interfaces between the LMOS Host and various system and subsystems.	Nashville, TN Birmingham, AL Jackson, MS Charlotte, NC Miami, FL	TN, KY TN AL, LA, MS GA, NC, SC FL
		LMOS–HOST	Loop Maintenance Operation System Host – Stores and maintains customer records that are used to support maintenance operations.	Birmingham, AL Charlotte, NC	AL, LA, MS, KY, TN NC, SC, GA, FL
		MLT	Mechanized Loop Testing – uses operational software to make loop measurements and to provide interactive testing capability.	Birmingham, AL Charlotte, NC	TN, KY, AL, MS, LA NC, SC, GA, FL
		WFA	Work Force Administration System – WFA/C coordinates and tracks installation and maintenance activities. Provides ready access to detailed circuit records and circuit history.	Charlotte, NC Birmingham, AL	FL, NC, SC GA, AL, KY, LA, MS, TN
		MARCH	Memory Administration Recent Change – Memory administration system that translates line-related service order data into switch provisioning messages and automatically transmits the messages to targeted stored program control switches.	Charlotte, NC Birmingham, AL	FL, GA, NC, SC AL, LA, MS, KY, TN
		SOAC	Service Order Activation and Control – Receives orders from SOCS and routes them to all appropriate interfaces for assignment	Charlotte, NC Birmingham, AL	GA, SC, FL KY, LA, NC, AL, TN, MS

APPLICATIONS/SYSTEMS/DATABASES

Electronic Interface Applications	CLECs Databases	BellSouth OSS (shared by CLECs)	FUNCTION	SERVER Location(s)	STATE(S) Served
		COSMOS	Computer System for Mainframe Operations – assists the Line and Number Administration and Frame Control Centers in managing, controlling and utilizing main distribution frame and central office equipment, facilities and circuits.	Charlotte, NC Birmingham, AL	FL, GA, NC, SC LA, AL, MS, KY, TN
		SWITCH	COSMOS functional replacement	Charlotte, NC Birmingham, AL	FL, GA, NC, SC AL, KY, LA, MS, TN
		FOMS/FUSA		Charlotte, NC Birmingham, AL	FL, GA, NC, SC AL, KY, LA, MS, TN
		TIRKS	Trunk Integrated Record Keeping System – enables flowthrough provisioning within a single integrated operational environment while improving the management and use of interoffice facilities and related equipment.	Charlotte, NC Birmingham, AL	FL, NC, SC GA, AL, KY, LA, MS, TN

Currently, there are no projects in the planning or development stages to replace any of the applications, interfaces or databases listed; except, LMOS FE will be replaced by the LMOS Replacement project, and COSMOS will be replaced by SWITCH and FOMS/FUSA.

BEFORE THE TENNESSEE REGULATORY AUTHORITY

REBUTTAL TESTIMONY OF

SHARON E. NORRIS

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AND TCG MIDSOUTH, INC.

DOCKET NO. 01-00362

NOVEMBER 20, 2001

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. I am Sharon Norris and my business address is P.O. Box 658, Loganville, Georgia 30052.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND AND EXPERIENCE.

A. My education and relevant work experience are as follows. I received a degree in Distributive Education from DeKalb College in 1972. I have been employed in the telecommunications industry for over twenty-seven years. I began my career with Southern Bell in 1973, in one of its Commercial Business offices in Atlanta, Georgia. From 1973 until 1983, I held various positions in Southern Bell's business offices, business marketing organizations, retail stores, and support staff organizations. In 1983, at the time of the Bell Telephone breakup, I chose to move from Southern Bell to AT&T, where I worked in the Consumer Sales Division of American Bell and later AT&T Information Systems. From 1985 until 1991, I worked in the Human Resources department of AT&T. In 1991, I

transferred to AT&T's Law and Government Affairs Division. Initially, I served as a loan executive to the Governor's Efficiency Commission for the State of Georgia. In this capacity, I examined current government practices and policies designed to increase government efficiency. In 1995, I became AT&T's representative to the Georgia Public Service Commission ("Georgia Commission" or "GPSC"). In this role, I advocated AT&T's position on regulations and issues regarding opening local exchange markets to competition. I continued in this role until 1997, when I also began to monitor and analyze BellSouth's compliance with its obligations to provide AT&T nondiscriminatory access to BellSouth's Operational Support Systems ("OSS") throughout its nine-state territory. I retired from AT&T in 1998, and am now a consultant with SEN Consulting, Inc. In this capacity, I continue to monitor and analyze BellSouth's compliance with its obligations to provide AT&T nondiscriminatory access to BellSouth's OSS.

Q. PLEASE DESCRIBE YOUR CURRENT EMPLOYMENT AND THE SCOPE OF YOUR RESPONSIBILITIES.

A. I am a consultant with SEN Consulting, Inc.

Q. HAVE YOU PREVIOUSLY PARTICIPATED IN OTHER PROCEEDINGS THAT RELATE TO THIS PROCEEDING?

A. Yes. I have appeared in state workshops in Alabama, Florida, Georgia, Kentucky, Louisiana, North Carolina, South Carolina, and Tennessee that covered a wide range of topics including: OSS, performance measures, and third-party testing. I also have testified before the Alabama, North Carolina, and South Carolina Public Service Commissions. I have participated in meetings with the Federal Communications Commission ("FCC") and the Department of Justice ("DOJ") on

these same issues. I also filed an affidavits with the FCC on behalf of AT&T in Docket 01-277 and Docket 97-231 and have filed affidavits and testimony with other state commissions.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I am testifying on behalf of AT&T Communications of the South Central States, Inc. and TCG MidSouth, Inc. to discuss what KCI tested in Georgia and Florida.[1]

Q. ARE YOU FAMILIAR WITH THE THIRD-PARTY TESTING OF BELLSOUTH'S OSS IN GEORGIA AND FLORIDA?

A. Yes, I am.

Q. ARE THE GEORGIA AND FLORIDA OSS TESTS COMPARABLE?

A. No. The Georgia test by design did not include all areas of testing that have been included in other states. A comparison of KCI's third-party testing activities in Georgia and Florida establishes that KCI did not evaluate several specific areas of BellSouth's OSS that are being evaluated in Florida. Among the areas that KCI did not evaluate are: parity of performance; CLEC interfaces development; areas of performance measurements; and manual support systems.

Q. HAS THE FLORIDA TEST IDENTIFIED DEFICIENCIES THAT WERE NOT IDENTIFIED IN THE GEORGIA TEST?

A. Yes. Significantly, ongoing testing of BellSouth's OSS in Florida continues to identify numerous deficiencies described by KCI in 48 open observations and 58

[1] The results of the completed portion of the Georgia OSS test are summarized in the *Master Test Plan Final Report, Supplemental Test Plan Final Report* and *Flow-Through Evaluation* ("Final Report") submitted to the Georgia Commission on March 20, 2001, by KPMG Consulting, Inc. ("KCI"). The Georgia Commission held a hearing on that report on May 8, 2001. I have reviewed the Final Report in detail and I attended the depositions and hearing relating to the evaluation of the Report.

open exceptions[2] posted on the Florida PSC web-site. Of these, KCI's testing in Florida has produced 34 open exceptions and 33 open observations in areas that were not tested in the Georgia test. Many of these exceptions concern local number portability ("LNP"), OSS99 ordering issues, and CLEC-BellSouth relationship management issues. The Florida OSS test also has identified 9 open observations and 11 open exceptions in areas that the Georgia test addresses but in which the Georgia test did not show deficiencies. Finally, the Florida OSS test has identified some of the same types of deficiencies KCI identified, and BellSouth supposedly resolved, in the Georgia OSS test. Indeed, 6 observations and 13 exceptions are open in Florida for test areas KCI has determined were "satisfied" in the Georgia OSS testing. A chart summarizing the Florida observations and exceptions is attached as SEN3PT-1.

Q. DID KCI MEASURE BELLSOUTH'S PARITY OF PERFORMANCE IN THE GEORGIA TEST?

A. No. The Georgia third-party test did not objectively and accurately analyze BellSouth's OSS performance in providing service to CLECs and compare that performance to the service BellSouth provides itself and its affiliates. Evaluation of BellSouth's parity of performance is critical as an indicator of whether BellSouth provides non-discriminatory access to its OSS to CLECs. The FCC has stated parity measures are critical to assure BellSouth provides access that permits "[CLECs] to perform [OSS] functions in 'substantially the same time and

[2] To date, KCI has issued a total 140 observations and 122 exceptions in the Florida test.

manner'" as OSS functions used by BellSouth or its affiliates.[3] KCI, however, only tested parity in two areas in Georgia: Maintenance and Repair Process Evaluation (Test M&R10 of the GMTP) and xDSL Process Parity Evaluation (Test PO&P 16 of the GSTP).

Q. DOES THE FLORIDA OSS TEST EVALUATE ADDITIONAL PARITY MEASURES?

A. Yes, the Florida third-party test evaluates nine additional process parity tests: Order Flow-Through (Test TVV3); Account Management (Test PPR2); Training (Test PPR4); Provisioning Process; (Test PPR9); Billing Work Center (Test PPR 10); Bill Production (Test PPR11); and Functional Review of Pre-Order, Ordering, and Provisioning (Test TVV1); Manual Processing of Orders (PPR7); and Capacity Management. These nine process parity tests being conducted in Florida include areas that go to the heart of CLECs' ability to compete. Because KCI did not test these areas in Georgia, the TRA cannot make an informed evaluation of whether BellSouth's OSS grant CLECs nondiscriminatory access by relying on the Georgia test.

Q. AS PART OF THE GEORGIA TEST, DID KCI TEST CURRENT INTERFACES USED BY CLECS?

A. No. KCI failed to test current interfaces used by CLECs. KCI also failed to evaluate the current production version of certain ordering interfaces, e.g. OSS99 version of the Electronic Data Interchange ("EDI") and Telecommunications

[3] Memorandum Opinion and Order, *In the Matter of Joint Application by SBC Communications Inc.; Southwestern Bell Tel. Co., and Southwestern Bell Communications Services, Inc. (d/b/a Southwestern Bell Long Distance) for Provision of In-Region, InterLATA Services in Kansas and Oklahoma*, FCC 01-29 CC Docket No. 00-217 ¶ 104 (rel. January 22, 2001) ("*SWBT Kansas Oklahoma Order*"). *See also Bell Atlantic New York Order* ¶ 83.

Access Gateway ("TAG"). Over eighty percent (80%) of current CLEC transactions are conducted using OSS99 software. KCI also did not evaluate in Georgia any versions of other interfaces, e.g., LENS which is currently the most popular interface[4], and Robo-TAG, which combines TAG with a front-end Graphical User Interface ("GUI"). KCI's test, therefore does not reflect the real world of CLEC competition.

Q. IS THE FLORIDA TEST EVALUATING BELLSOUTH'S CURRENT INTERFACES?

A. Yes. Florida is testing OSS99 and other upgrades that were not tested in Georgia.

Q. DID KCI EVALUATE CLECS' ABILITY TO BUILD INTERFACES BASED ON BELLSOUTH'S DOCUMENTATION?

A. No. KCI did not evaluate the adequacy of BellSouth's documentation for designing and building OSS interfaces in Georgia. A meaningful OSS test must evaluate: (a) whether BellSouth provides CLECs with the necessary documentation to design, develop and maintain OSS that can interface with BellSouth's OSS; and (b) the functionality of BellSouth's OSS interfaces used in commercial production.

Q. DOES THE FLORIDA OSS TEST INCLUDE A REVIEW OF CLECS' ABILITY TO BUILD INTERFACES?

A. Yes, the Florida Public Service Commission required KCI to build interfaces based on interface documentation from BellSouth intended for the CLEC community – just like real world CLECs must build them. New York also tested

[4] According to BellSouth's August flow-through report, LENS (one of the interfaces not tested) accounted for 66% of the total of the electronic Local Service Requests submitted in the region.

whether CLECs could build interfaces using the ILEC's instructions and support. (*See Bell Atlantic New York Order* ¶ 134-135.)

Q. IN GEORGIA, DID KCI TEST UNES SUFFICIENTLY?

A. No. BellSouth claims that it offers CLECs over eighty UNEs.[5] KCI, however, evaluated only six UNEs for ordering, provisioning, and billing activities.[6] Key UNEs omitted from these tests include digital UNEs, Enhanced Extended Links ("EELs"), customized routing of Operator Services and Directory Assistance, and line-sharing.

UNE billing testing in Georgia, moreover, was limited to those few order types that had been part of the ordering and provisioning tests. The billing evaluation did not mirror the experiences of actual CLECs because the testing did not rely on the results of actual pre-ordering, ordering and provisioning activities. Accordingly, the Georgia test provides information about only a small portion of BellSouth's activities.

Q. DID KCI ADEQUATELY TEST PERFORMANCE MEASURES?

A. No. The Georgia OSS Test includes as part of the supplemental test plan an evaluation of metrics, or performance measures. This analysis, however, does not include the following important elements:

- Local number portability measures;
- Processes for developing SQM definitions and standards;

[5] *See Georgia Master Test Plan*, Version 4.0 at A-4.

[6] xDSL was added in the Supplemental Test Plan.

- Data integrity assessment of CLEC and retail transactions end-to-end through the data filtering process;
- Analysis of the adequacy and appropriateness of BellSouth-provided measures;
- Test metrics based upon collaborative process with a series of comments and workshops; and
- Comparison of test metrics results to CLEC results.

All of these are being tested in Florida.

Q. DID KCI TEST BELLSOUTH'S MANUAL SUPPORT SYSTEMS IN GEORGIA?

A. No. OSS consist of both automated and manual systems and processes. KCI focused on BellSouth's automated systems and disregarded critical manual processes that support and complement the automated systems.

Q. PLEASE GIVE EXAMPLES OF THE MANUAL PROCESSES KCI FAILED TO TEST IN GEORGIA.

A. KCI failed to test BellSouth's:

- Account Establishment and Management Verification and Review
- OSS Interface Help Desk Functional Review
- CLEC Training Verification and Validation Review
- Collocation and Network Design Verification and Validation Review
- Manual Order Process
- Work Center Support Evaluation
- Provisioning Process Evaluation
- Billing Work Center Evaluation
- Maintenance and Repair Work Center Support Evaluation
- Network Surveillance Support Evaluation.

The OSS test in Florida evaluates all of these key areas.

Q. IS A REVIEW OF MANUAL PROCESSES NECESSARY FOR A THIRD-PARTY TEST?

A. Yes. In order to demonstrate that it provides nondiscriminatory access to its OSS, BellSouth "must first demonstrate that it 'has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and . . . is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them.'" (*Bell Atlantic New York Order* ¶ 126 (citations omitted).)

The failure to evaluate BellSouth's manual support systems is an especially critical flaw for this proceeding. For two of the areas in which KCI concluded that BellSouth did not satisfy the test—accuracy of rejects and clarifications and accuracy of switch translations—BellSouth blamed errors by personnel in the Local Carrier Service Centers ("LCSCs") for the not satisfied results.

Q. DID THE GEORGIA TEST ADEQUATELY EVALUATE BELLSOUTH'S RELATIONSHIP MANAGEMENT PRACTICES?

A. No, relationship management was not part of the Georgia test. Despite BellSouth's representations to the contrary, this is unlike the New York third-party test that the FCC found to be persuasive. In that test, KPMG evaluated "[a]ll stages of the relationship between Bell Atlantic and competing carriers . . . , from establishing the initial relationship, to performing daily operations, to maintaining the relationship." (*Bell Atlantic New York Order* ¶ 97)

Q. DOES THE FLORIDA TEST EVALUATE BELLSOUTH'S RELATIONSHIP MANAGEMENT PRACTICES?

A. Yes. The Florida OSS testing identified exceptions that concern the business relationship between BellSouth and CLECs. For example, Florida Test PPR2 evaluates BellSouth's policies and practices for establishing and managing CLEC account relationships. KCI is evaluating these relationships to determine their adequacy, completeness, and compliance with stated BellSouth policies and procedures. Additionally, to the extent specific retail analogs were identified, the test is designed to compare BellSouth's wholesale and retail performance for parity. KCI currently has one open observation and one open exception regarding Test PPR2.

Q. WHY DO CLECS NEED TO HAVE DOCUMENTED PROCEDURES IN THESE AND OTHER AREAS?

A. CLECs cannot be sure that the information it receives from BellSouth is consistent and repeatable throughout the BellSouth organization without documented procedures in these and other areas. Every CLEC is required to go through the start-up procedures to establish an account with BellSouth as well as depend on the account team for a myriad of day-to-day activities. CLECs may be hindered in their ability to establish their accounts promptly and efficiently because of inconsistent and contradictory information provided by BellSouth. KCI evaluated none of these relationships in the Georgia test.

Q. DID KCI TEST LOCAL NUMBER PORTABILITY ("LNP") METRICS IN THE GEORGIA THIRD-PARTY TEST?

A. No. KCI's testing was limited and did not include any metrics evaluations for LNP activities.

Q. IS KCI TESTING LNP METRICS IN THE FLORIDA TEST?

A. Yes.

Q. PLEASE DESCRIBE THE LNP METRICS DEFICIENCIES KCI HAS IDENTIFIED IN THE FLORIDA TEST.

A. To date, KCI has issued at least 6 exceptions regarding the accuracy of BellSouth's LNP metrics calculations and its ability to verify metrics reports.[7] (Test PMR5.) For example, Exception 10 notes that for May 2000, BellSouth's metrics calculations for its Ordering: LNP—reject interval in the SQM reports were inconsistent with how the SQM documentation said they should be calculated. Moreover, KCI identified twenty-four discrepancies where BellSouth reported time intervals using a method other than that defined in its SQM. Failure to calculate performance measures using the defined methodology seriously impacts the integrity of the data provided to CLECs and to the TRA regarding BellSouth's response to LNP orders. There are currently 5 open deficiencies (Observations 113, 125, and 134 and Exceptions 10 and 22) that relate directly to local number portability measures.

[7] Exceptions 10, 11, 14, 21-22, and 24 all concern various aspects of KCI's LNP testing of metrics calculation and verification review.

Q. WHY ARE LNP METRICS IMPORTANT?

A. LNP is essential for CLECs to compete meaningfully in the local exchange market. LNP allows consumers to keep their own telephone numbers when switching carriers. Many local service orders, therefore, include LNP. Accordingly, evaluating BellSouth's ability to provide ordering and provisioning of LNP is essential to evaluating whether CLECs have a meaningful opportunity to compete. CLECs use BellSouth's SQMs to evaluate whether the service provided by BellSouth to CLECs is nondiscriminatory. If BellSouth's data is inaccurate, CLECs and the TRA are prevented from receiving an accurate measure of BellSouth's performance. The deficiencies identified in Florida call into serious question BellSouth's reporting of its performance on orders involving LNP.

Q. DID THE GEORGIA THIRD-PARTY TEST EVALUATE BILLING?

A. KCI conducted an evaluation of billing in Georgia. Ultimately, in Georgia, KCI concluded that BellSouth had satisfied billing tests even though KCI identified problems with billing. As the TRA is aware, the ability to receive accurate and timely billing information is essential for CLECs to provide good service to their end-user customers. However, in spite of KCI's determination in Georgia that BellSouth has satisfied all its billing tests, problems in some areas KCI deemed resolved in Georgia subsequently occurred in the Florida tests. KCI currently has 1 open observation and 8 open exceptions in the area of billing in Florida. This could suggest, among other things, that the scope of the billing tests in Florida is different or that BellSouth has made changes in its billing systems.

Q. PLEASE GIVE EXAMPLES OF THOSE PROBLEMS.

A. Florida Exception 43 and Georgia Exception 103 both address the issue that BellSouth bills fail to reflect usage charges. The Georgia exception was closed on March 23, 2001, and the Florida exception was opened on April 4, 2001. Similarly, Florida Exception 13 and Georgia Exception 29 both address BellSouth's lack of timely delivery of daily usage records to CLECs. The Georgia exception was closed on August 4, 2000, and the Florida exception was opened February 27, 2001. On May 23, 2001, Florida Exception 62 was created due to BellSouth's incorrect charges for mechanized service ordering. This same rate had been part of Georgia Exceptions 16 and 124. Georgia Exception 16 and Exception 124 were closed on April 6, 2001. KCI has found that "some tests, notably the billing usage tests, have significant issues . . . ." [8]

Q. ARE THERE ADDITIONAL BILLING TESTS THAT SHOULD BE CONDUCTED?

A. Yes. BellSouth plans to implement new UNE billing systems. KCI recently recommended that the Florida Commission pursue testing of these systems. KCI recommended, and BellSouth has agreed to, additional testing for bill validation, usage, and process tests associated with the BellSouth's billing system. (*See* SEN3PT-2.)

Q. WHY IS A THOROUGH EVALUATION OF CHANGE MANAGEMENT NECESSARY?

A. Adequate change control procedures are necessary to ensure CLECs have sufficient time to adapt their systems to BellSouth's changes. Unexpected

changes to documentation can temporarily halt testing, slow the development process, and in some instances, prevent a CLEC from being able to do business with BellSouth. Competing carriers need information about and specifications for an incumbent's systems and interfaces in order to develop and modify their systems and procedures to access the incumbent's OSS functions. Accordingly, in considering an incumbent's evidence that it offers an efficient competitor a meaningful opportunity to compete, "the Commission will give substantial consideration to the existence of an adequate change management process and evidence that the BOC has adhered to this process over time." (*Bell Atlantic New York Order* ¶ 102.) Indeed, the FCC has recognized that "change management problems can impair a competing carrier's ability to obtain nondiscriminatory access to UNEs, and hence a BOC's compliance with § 271(c)(2)(B)(ii)." (*Id.* at 103.)

The importance of a strong change management capability was highlighted when Bell Atlantic-New York's ("BA-NY") OSS "crashed" in early 2000 because of inadequate mechanisms to permit OSS changes to be fully implemented on a timely and coordinated basis. Despite extensive (and expensive) work-arounds, CLECs simply could not compensate for this massive problem, and tens of thousands of customers' orders were lost or delayed, including 40,000 AT&T orders.

[8] *See* Letter dated October 23, 2001 from David B. Wirsching III to Lisa Harvey (attached as SEN3PT-2.)

Q. IS KCI TESTING CHANGE MANAGEMENT IN FLORIDA?

A. Yes, and KCI has identified deficiencies in BellSouth's change control processes. KCI's third-party testing in Florida currently has 4 open observations and 3 open exceptions in this important area.

Q. DID KCI EVALUATE CHANGE MANAGEMENT IN GEORGIA?

A. Yes. However, KCI's testing in Georgia did not evaluate key areas such as compliance with notification and documentation intervals in the change management process, the existence of a cooperative testing environment for changes, and demonstrated cooperation with CLECs in implementing change. Instead, KCI's evaluation process focused on the existence of documentation describing the process, not on the appropriateness or adequacy of the process or on the timeliness and adequacy of implementation. (*See* Transcript of Hearing Before Georgia Public Service Commission, Docket No. 8354-U, dated May 8, 2001 at 205:10-20 (attached as SEN3PT-3).)

Q. ARE THE CHANGE MANAGEMENT SYSTEMS BEING TESTED IN FLORIDA THE SAME AS THOSE TESTED IN GEORGIA?

A. No. As BellSouth witness Milton McElroy explained in his October 10, 2001 deposition, BellSouth's change management systems are evolving. (*See* Transcript of Deposition of Milton McElroy, North Carolina Utilities Commission, Docket No. P-55, Sub 1022, Oct. 8, 2001 (excerpts attached as SEN3PT-4) at 177:8-9; 179:13-23; 180:5-25.)

Q. DID THE GEORGIA TEST EVALUATE THE ABILITY OF BELLSOUTH'S OSS TO HANDLE REAL WORLD CLEC VOLUMES?

A. No. The volume testing in Georgia was not conducted in BellSouth's production environment, ENCORE. Instead, BellSouth enhanced a special test environment, RSIMMS, for performance of the volume test. (*See* SEN3PT-3 at 213:13-23.)

Q. IS SUFFICIENT VOLUME CAPACITY CRITICAL TO SUPPORTING CLECS' ENTRY INTO THE LOCAL EXCHANGE MARKET?

A. Yes. CLECs are dependent on BellSouth's OSS for pre-ordering information, ordering and provisioning, billing, and maintenance and repair. Inadequate OSS would place CLECs at a competitive disadvantage because they will not be able to assure their customers that the CLECs' service will be at least as accurate, dependable, and fast as service provided by BellSouth. Inadequate OSS also impacts the consumers directly. Without nondiscriminatory access to OSS, CLECs "'will be severely disadvantaged, if not precluded altogether, from fairly competing' in the local exchange market."[9] If BellSouth's OSS cannot handle the volumes of CLEC transactions, customers will be negatively impacted because CLECs will not be able to process their requests promptly.

Q. HAS KCI EVER CONDUCTED VOLUME TESTING FOR A THIRD-PARTY TEST OF AN ILEC'S OSS IN AN ARTIFICIAL ENVIRONMENT IN ANY STATE OTHER THAN GEORGIA?

A. No. In fact, during the Georgia OSS testing, KCI told BellSouth "running the volume test in something other than the production environment was not "a[s] strong a record as running that same test in the production environment . . . ." (SEN3PT-3 at 219:16-21.) BellSouth nonetheless chose to run the test in the

artificial environment because it did not want to spend money to upgrade its production system. (*See id.* at 213:13-23.)

Q. DO THE RESULTS FROM THE TEST ENVIRONMENT ASSURE THAT THE PRODUCTION ENVIRONMENT UPON WHICH CLECS WILL RELY WILL PERFORM AT THE SAME LEVEL AS THE ENVIRONMENT TESTED?

A. No, and KCI admitted at the third-party test hearing conducted by the Georgia Commission on May 8, 2001, that the results from the test environment do not assure that the production environment upon which CLECs will rely will perform at the same level as the environment tested. (*See id.* at 226:23-227:15.)

Q. IS RSIMMS, BELLSOUTH'S ARTIFICIAL TEST ENVIRONMENT, EQUAL TO ENCORE, BELLSOUTH'S PRODUCTION ENVIRONMENT?

A. No. The Final Report on its face reveals that RSIMMS has at least twice the capacity of the production system. For all three applications at issue, TAG, LESOG, and LNP, the test environment possessed substantially more power than BellSouth's production environment. The RSIMMS TAG servers have 4GB of memory whereas the ENCORE TAG servers only have 2GB. This difference allows the RSIMMS TAG servers to "'deliver a 20% faster compute performance'" than the ENCORE servers. (*See RSIMMS and ENCORE Systems Review* in Final Report ("*RSIMMS Report*") at 7.)

Likewise, the RSIMMS environment runs three LESOG servers, each of which possess a compute performance four to six times that of the two ENCORE LESOG servers. (*See id.* at 8.) Additionally, the combined compute capacity of

[9] *See Bell Atlantic New York Order* ¶ 83 (citations omitted).

the RSIMMS LNP servers is almost 100% greater than the combined capacity in ENCORE. (*See id.* at 7-8.)

Q. DID KCI CONDUCT AN ANALYSIS FOR PURPOSES OF EVALUATING WHETHER THE HARDWARE AND SOFTWARE CONFIGURATIONS IN RSIMMS MIRRORED THE CONFIGURATIONS IN ENCORE?

A. Yes, KCI recognized that additional hardware and software had been created to support the specified test volumes. (*See id.*) For example, the directory structures between the two systems were different. (*See id.* at 15.) Such differences could affect the capacity of the system, but have not been tested.

Q. ARE THERE OTHER DIFFERENCES BETWEEN RSIMMS AND ENCORE THAT COULD ADVERSELY AFFECT ENCORE'S PERFORMANCE?

A. Yes. ENCORE is configured to run from a local area network ("LAN") across three data centers while RSIMMS is run from a wide area network ("WAN") within one data center. (*See RSIMMS Report* at 5 & 7.) Inherent delay across BellSouth's LAN could negatively impact ENCORE's performance. *Id.* Testing in RSIMMS simply cannot provide an accurate picture of what will happen in ENCORE.

Q. DID KCI CONDUCT VOLUME TESTING IN BELLSOUTH'S PRODUCTION ENVIRONMENT IN GEORGIA?

A. KCI conducted limited volume testing of BellSouth's production environment. KCI's testing was based on the existing capacity of the production system, not projected order volumes. KCI submitted only 24,594 pre-orders and 7,429 orders in the production environment test. (*See* SEN3PT-3 at 240:11-15.) When KCI ran normal volume testing in BellSouth's artificial test environment, the numbers

of transactions were based on projected volume and were much greater: 118,000 pre-orders and 35,000 orders. (*See id.* at 240:16-19.)

Q. DID KCI'S VOLUME TEST IN GEORGIA INCLUDE ALL ORDER TYPES AND INTERFACES?

A. No. KCI's testing did not assess volume processing of partially mechanized and manual orders. It did not include the GUI interfaces (LENs and Robo-TAG) or the repair interface (TAFI), and it did not include all order and product types.

Q. DID KCI CONDUCT ANY VOLUME STRESS TESTING IN GEORGIA?

A. No. Stress tests are designed to determine the outer limits of a particular system's or interface's volume capacity. Typically, stress tests are an attempt to escalate significantly the volumes in order to identify potential weak points in the system. KCI did not conduct stress testing in either the RSIMMS test environment or the ENCORE production environment.

Q. DOES THE FLORIDA OSS TEST INCLUDE VOLUME TESTING IN BELLSOUTH'S PRODUCTION ENVIRONMENT?

A. Yes. KCI is conducting its Florida volume testing in BellSouth's production environment and has encountered problems. In fact, when KCI began its normal volume testing in Florida, the test had to be aborted after a single day of testing because BellSouth's systems could not handle the normal volumes.

Q. HAS KCI COMPLETED ALL OF THE PLANNED VOLUME TESTING IN FLORIDA?

A. No. The volume test was halted after a single day of testing at normal volumes when BellSouth's systems failed to perform as required. After BellSouth corrected the identified defects, a re-test of one day of normal volume testing was

conducted during the week of October 29, 2001. KCI is currently evaluating the results of that testing. In all, KCI is required by the test plan to conduct normal volume testing using projected order volumes for September 2002, peak volume testing at 150% of the volumes used for normal volume testing, and stress testing at 250% of normal volume testing.

Q. IS KCI'S TEST IN GEORGIA COMPLETE?

A. No, KCI's metrics evaluation in Georgia is not complete. Moreover, because of the significant changes to BellSouth's performance measures required as a result of the Georgia Commission's January 12, 2001 Order, the Georgia Staff requested an audit of BellSouth's SQM and enforcement metrics. This audit is separate and apart from the "metrics evaluation" by KCI. The audit is ongoing and, based on the most recent status call, BellSouth is not generating performance reports that can be replicated using BellSouth's data. The Florida Commission is testing these new measures and KCI has 10 open exceptions and 13 open observations in the area of performance metrics. The audits in both Georgia and Florida are not scheduled to be completed until late March 2002.

Q. DID KCI INTEND FOR ITS GEORGIA TEST TO BE USED IN OTHER JURISDICTIONS?

A. No. In response to cross examination at the North Carolina 271 hearing on November 1, 2001, KCI Managing Director Michael Weeks testified, "if the question you're asking me is how should you guys go about it—about the Georgia record sitting here in another jurisdiction, I think that, in the first place, as we say in our report, we never intended the Georgia report to be used by other than the

Georgia Commission. That's clear on the first page of our disclaimers. And so it gives us a little bit of cause for pause that it's being used in another jurisdiction in a way that we didn't intend for it to be used and in a way that we explicitly tried to keep from happening." (See SEN3PT-5 at 137:20-27 and 138:3-6.)

Q. OVERALL, WAS THE GEORGIA TEST AS COMPREHENSIVE AS THE FLORIDA TEST?

A. No. KCI in Georgia did not evaluate areas that may have substantial impact on CLECs' ability to compete. For example, the interfaces, relationship management, manual systems and LNP metrics BellSouth currently uses were not evaluated in the Georgia test. Nor did KCI fully evaluate whether BellSouth's existing production system can handle real-world CLEC volumes. Indeed, the ongoing Florida test is uncovering numerous deficiencies in BellSouth's OSS both in areas that were not tested in Georgia, in areas in which the Georgia test was not sufficiently robust, and in areas in which BellSouth's systems or processes have changed.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

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Open Observations and Exceptions in Florida Third Party Test

Open Observations outside scope of Georgia Third Party Test

	Obser v.	Test #	Description	Comments
1	49	TVV-1 (3/13/01)	BST does not provide time stamps for LSRs for clarifications and completion notices via LENS.	Not included in Georgia Test --OSS99 not tested, LENS not tested.
2	64	TVV1 (5/3/01)	KPMG has not received responses to several LSRs submitted via TAG interface.	Not included in Georgia Test --OSS99 not tested.
3	87	TVV1 (6/29/01)	The LENS interface does not support orders requesting to move a CLEC account outside of the end user's location.	LENS not tested in Georgia.
4	91	TVV1 (7/09/01)	BellSouth provides inaccurate and inconstant date and time stamps on their responses to LSRS submitted via RoboTAG.	RoboTAG not tested in Georgia
5	92	TVV1 (7/9/01)	KPMG has not received FOCs from the LCSC after faxing supplemental LSRS to cancel existing orders.	Non-mechanized ordering (other than xDSL) not tested in Georgia.
6	94	TVV3 (8/18/01)	KPMG did not receive flow-through FOCs on LRS submitted electronically via the mechanized ordering process	OSS99 not tested in Georgia
7	95	TVV1 (8/01/01)	KPMG has not received timely mechanized UNE combinations FOCs from BST 's TAG interface.	OSS99 not tested in Georgia
8	99	TVV1 (08/08/01)	BST's RoboTAG information requirement for REQTYP M ACT W is inconsistent with business rules.	RoboTAG not tested in Georgia.
9	100	TVV1 (08/08/01)	KPMG has not received timely CNs submitted via EDI and TAG.	OSS99 not tested in Georgia.
10	104	TVV1 (08/09/01)	KPMG has experienced multiple system errors while processing LSRS through LENS.	LENS not tested in Georgia.
11	105	PMR5 (08/10/01)	KPMG cannot replicate the values in hot cuts troubles within 7 days.	This measure not part of Georgia test.

TRA Docket No.: 01-00362
Phase 1 Rebuttal –Norris
Exhibit SEN-3PT-1

Open Observations and Exceptions in Florida Third Party Test

12	108	TVV1 (8/16/01)	BST Business Rules for Local Ordering OSS99 contains inconsistent and incomplete instructions.	OSS99 not tested in Georgia
13	109	PPR8 (8/21/01)	The service level of access objectives for BST's wholesale and retail call centers are not at parity.	Test PPR 8 out of scope
14	111	PPR-8 (8/29/01)	BellSouth has implemented an inadequate process for CLEC interaction with the Local Carrier Service Center (LCSC) Fleming Island Call Center.	Test PPR 8 out of scope for Georgia. Will be escalated to an exception.
15	112	PMR-2 (9/5/01)	The formula specified in the ordering acknowledgement timeliness document is inconsistent with the benchmark ordered by FPSC.	Florida Issue
16	113	PMR-5 (9/5/01)	KPMG cannot replicate LNP TSOCT metric.	LNP metrics not evaluated in Georgia.
17	114	PPR-7 (8/29/01)	The performance evaluation processes and procedures for BellSouth's retail and wholesale manual ordering are not at parity	Test PPR7 out of scope for Georgia
18	115	PPR-2 (8/31/01)	The BellSouth Account Team does not respond to CLEC inquiries within the documented customer contact timeframes.	Test PPR-2 out of scope for Georgia.
19	121	TVV-4 (10/5/01)	BST's unbundled dark fiber procedure document does not reference requirements for cross office continuity test.	Not included in Georgia Test.
20	122	TVV-1 (10/5/01)	KPMG has not received completion notices to LSRs submitted via TAG.	Not included in Georgia Test—OSS 99 not tested.
21	123	PPR-5 (10/05/01)	BST does not have processes or documentation available with sufficient detail to guide a CLEC during the upgrade from one version of an interface to a different version.	Not included in Georgia Test—interface development not tested.
22	125	PMR5 (10/12/01)	KPMG cannot replicate the values in LNP missed appointments measure	LNP metrics not evaluated in Georgia
23	127	TVV-1 (10/15/01)	BST does not provide complete FOC or CN responses to xDSL service requests submitted	LENS not tested in Georgia.

Open Observations and Exceptions in Florida Third Party Test

			through LENS.	
24	129	PMR-5 (10/23/01)	KPMG cannot replicate values of FOC Timeliness Trunks	Different business rules were in effect during Georgia Test.
25	130	PPR7 (10/23/01)	BST LCSC procedures for handling fax failures are not documented.	Not included in Georgia Test—Manual Order Process not included in Georgia Test.
26	132	PPR3 (11/6/01)	BellSouth ECS help desk does not maintain an accurate tracking system for troubles reported to ECS Help desk.	Not included in Georgia Test.
27	133	PMR2 (11/1/01)	The definitions and calculations specified in the M&R Mean time To Notify CLEC of Network Outages SQM are inconsistent with the benchmark ordered by the FPSC.	Refers to FL SQM, but language is the same in Georgia SQM. This measure was not evaluated in Georgia.
28	134	PMR5 (11/6/01)	BellSouth's failure to report values for LNP Disconnect Timeliness prevents KPMG from conducting the metrics calculations test.	LNP metrics out of scope in Georgia.
29	135	TVV2 (11/7/01)	KPMG has not received timely responses for pre-order queries submitted via LENs.	Normal volume testing not conducted in production environment in Georgia.
30	136	TVV2 (11/7/01)	KPMG has not received timely responses for pre-order queries submitted via RoboTAG.	Normal volume testing not conducted in production environment in Georgia.
31	137	PMR5 (11/12/01)	KPMG cannot replicate the values in the FOC and Reject Response Completeness SQM Report for the CLEC aggregate. RDUM instructions insufficient for calculating this metric..	Newer measure. Not included in Georgia test.
32	138	PMR5 (11/12/01)	KPMG has found that RDUM instructions for Service Inquiry +FOC Response Time Manual are misleading.	Newer measure. Not included in Georgia test.
33	139	PMR5 (11/13/01)	KPMG cannot replicate the values in the # completions/attempts without notice or with less than 24 hours notice measure. RDUM instructions insufficient.	Newer measure. Not included in Georgia test.

Open Observations and Exceptions in Florida Third Party Test

Open Exceptions outside scope of Georgia Third Party Test

	Except.	Test #	Description	Comments
1	6	PPR-5 (9/21/00)	BST lacks an appropriate process, methodology and a robust test environment for testing of the EDI interface.	Not included in Georgia Test—interface development not tested.
2	10	PMR-5 (12/4/00)	KPMG has found that BST's metrics calculations for LNP reject intervals are inconsistent with the documented metrics calculations (formerly observation 12).	LNP metrics not included in Georgia Test.
3	16	TVV-1 (3/5/01)	BST business rules for ordering (9K) do not offer the ability to submit an order for the partial migration of customer's UNE loops.	Functional evaluation of OSS 99 not included in Georgia Test.
4	22	PMR-5 (3/12/01)	KPMG cannot replicate the values of LNP Disconnect Timeliness measure.	LNP metrics not included in Georgia Test.
5	42	TVV-1 (4/4/01)	The TAG interface does not accurately implement the End User information requirements contained in OSS99 business rules.	Functional evaluation of OSS 99 not included in Georgia Test.
6	49	TVV-1 (4/24/01)	The BellSouth Business Rules for Local Ordering-OSS 9 does not define a process for an unbundled loop (REQTYP A) service migration (ACT V) request from one CLEC to another CLEC.	Functional evaluation of OSS 99 not included in Georgia Test.
7	51	TVV-1 (4/25/01)	KPMG has not received timely mechanized rejects from BellSouth's EDI interface.	Functional evaluation of OSS 99 not included in Georgia Test.
8	54	TVV-1 (5/3/01)	KPMG has not received timely mechanized rejects from BellSouth's TAG interface.	Functional evaluation of OSS 99 not included in Georgia Test.
10	72	TVV-2 (6/28/01)	KPMG has not received responses to multiple Local Service Request submitted to BST via fax.	No manual volume testing was done in Georgia.
11	74	TVV-1	The RoboTAG interface does not provide access to	RoboTAG not tested in Georgia.

Open Observations and Exceptions in Florida Third Party Test

		(6/28/01)	fields that are required for non-designed loop service disconnect and for ISDN BRI resale service disconnect requests.	
12	75	TVV-1 (6/28/01)	BST's error responses are inconsistent with the BellSouth business rules for local ordering OSS 99 for conversions of retail, resale, and UNE-P accounts to line-sharing accounts	Line-sharing not tested in Georgia.
13	77	TVV-1 (6/28/01)	BellSouth LSR rejection messages are inconsistent with the BellSouth Business Rules for Local Ordering OSS99 for designed UNE loop with LNP service requests via TAG.	Functional evaluation of OSS 99 not included in Georgia Test.
14	85	TVV-1 (07/16/01)	KPMG has not received timely mechanized resale FOCS from BST's EDI interface.	OSS 99 not tested in Georgia
15	86	TVV-3 (07/16/01)	KPMG did not receive flow-through FOCs on LSRs submitted electronically via the mechanized ordering process.	OSS99 not tested in Georgia
16	87	TVV-1 (07/16/01)	BST's TAG interface experiences various backend resource limitation exceptions that affect the transmission of local service requests and pre-order queries.	OSS99 not tested in Georgia
17	89	TVV-1 (07/16/01)	BST's LENS 9.2 is inconsistent with the BST Business Rules for Local Ordering Issue 9M.	LENS not tested in Georgia.
18	90	TVV-1 (07/20/01)	KPMG did not receive timely non-mechanized FOCs from BellSouth via fax and electronic mail.	Non-mechanized (other than xDSL) not tested in Georgia
19	95	PPR 2 (08/07/01)	The Account Establishment and Management Process does not have defined processes or documentation related to the management and resolution of metrics issues.	Account Management not tested in Georgia.
20	98	TVV-1 (08/09/01)	BST has transmitted CNs using an incorrect Transaction set via EDI	Functional evaluation of OSS 99 not included in Georgia Test.

Open Observations and Exceptions in Florida Third Party Test

21	99	TVV-2 (08/22/01)	KPMG has not received fully mechanized responses to multiple Local Service Requests submitted to BellSouth's EDI Interface	Volume test in production environment using OSS 99
22	100	TVV-1 (08/24/01)	KPMG has not received timely mechanized UNE loop FOCs from BellSouth's EDI interface.	OSS99. Formerly Observation 101
23	102	TVV-1 (4/12/01)	The RoboTAG interface fails to provide Miscellaneous Account Numbers (MANs) for all cities in Florida.	RoboTAG not tested in Georgia. Formerly Observation 60
24	103	PPR-8 (08/28/01)	BellSouth does not have documented guidelines for CLEC interaction with the LCSC Fleming Island Call Center.	LCSC processes not evaluated in Georgia
25	105	TVV-1 (8/29/01)	KPMG has not received responses to several Local Service Requests using EDI.	OSS 99 not tested in Georgia. Formerly observations 55 and 65.
26	107	TVV-2- (8/29/01)	KPMG has not received fully mechanized responses to multiple LSRs submitted to BST's TAG interface.	Volume test in production environment using OSS 99
27	109	PMR-5 (9/6/01)	KPMG cannot replicate the values in the Ordering Acknowledgement Message Timeliness	Measure not included in Georgia Test. (New Measure)
28	110	PPR-8 3(10/03/01)	BellSouth does not have adequate guidelines for call tracking and resolution at the LCSC.	LCSC processes not evaluated in Georgia.
29	113	PMR-4 (10/04/01)	KPMG has found that BST does not capture xDSL transactions in the flow-through measure.	Electronic xDSL not tested.
30	116	TVV2 (11/01/01)	BellSouth representatives did not provide expected responses to Local Service Requests submitted by KPMG via fax.	No manual volume testing conducted in Georgia.
31	117	TVV1 (11/01/01)	KPMG has not received manual FOCs on service that have been assigned a completed status in BellSouth's Customer Service Order Tracking System (CSOTS)	Not included in Georgia Test. Manual ordering for resale and EELs not conducted in Georgia. (Formerly Observation 81)
32	118	TVV2 (11/7/01)	KPMG has received invalid responses to pre-order queries submitted via TAG interface	Georgia normal volume testing not conducted in production environment.

Open Observations and Exceptions in Florida Third Party Test

33	121	TVV3 (11/13/01)-	KPMG could not identify flow-through FOCs on LNP Service Requests submitted electronically via the mechanized ordering process.	OSS 99 not tested in Georgia. LNP not included in flow-through evaluation conducted in Georgia.
34	122	TVV3 (11/13/01)	BST did not provide flow-through classification information for DSL orders submitted by KPMG.	Electronic ordering of xDSL not tested in Georgia. Previously Observation 128.

Open Observations and Exceptions in Florida Third Party Test

Open Observations in Florida in Areas that Also Had Exceptions in Georgia

	Observ.	Test #	Description	Comments
1	68	PMR-5 (5/12/01)	KPMG cannot replicate the values for the Ordering: Percent Flow-Through Service Requests SQM report for the CLEC Aggregate (November 2000)	Test area included in Georgia Test. Related to Exception 21.
2	80	TVV-11 (5/23/01)	The application of recurring and non-recurring charges associated with UNE ports denoted by the USOC UEPLX appear to be inconsistent.	See Georgia Exception 35 for billing errors with USOC UEPLX.
3	82	TVV-4 (6/13/01)	BellSouth's systems or representatives did not update Customer Service Records consistently following a change in the status of a customer's account.	Included in Georgia Test. See Georgia Exception 76.
4	106	TVV-4 (8/14/01)	BST's systems or representatives have not consistently updated the directory databases as specified in orders submitted by KPMG.s	See Georgia Exception 76.
5	117	TVV4 (9/12/01)	KPMG has observed that BellSouth.net has access to greater information from a loop qualification report than that of a CLEC requesting loop qualification for same number.	See Georgia Exception 107.
6	131	PMR3 (10/23/01)	KPMG has discovered that BST posted raw data on the PMAP website without simultaneously posting the corresponding release of the raw data user's manual.	See Georgia Exception 88

Open Observations and Exceptions in Florida Third Party Test

Open Exceptions in Florida in Areas that Also Had Exceptions in Georgia

	Except	Test Area	Description	Comments
1	13	TVV-10 (2/27/01)	BST failed to deliver at least 95% of DUF records within 6 calendar days.	Included in Georgia Test. *See* Georgia exception 29 (2/15/00 to 8/4/00).
2	27	PMR-5 (3/12/01)	KPMG cannot replicate the values of the Provisioning Troubles within 30 days of Provisioning measure. (former observation-32).	Test area included in Georgia Test. *See* Georgia exception 23 (2/11/00 to 1/5/01). Exception 86 (5/8/00 to open). Exception 123 (2/18/00 to 3/9/01).
3	36	PMR4 (3/21/01)	BST does not properly construct the processed data used to validate FOC and rejection timeliness (former observation-6).	Test area included in Georgia Test. Related to exception 87 (5/23/00 to 1/5/01).
4	38	TVV8 (3/27/01)	BellSouth's ECTA system failed to process correctly following an outage and re-initialization.	Included in Georgia Test. (M&R-2). Potentially related to Georgia exception 20 (2/14/00 to 3/07/00).
5	43	TVV11 (4/4/01)	BST resale bills fail to reflect usage charges.	Within scope of Georgia Test. *See* Georgia exception 103 (7/27/00 to 3/23/01).
6	62	TVV11 (5/23/01)	BellSouth bills reflect a rate for a Service Order mechanized Charge that is inconsistent with the rate contained in the ICA agreement between BST and KPMG CLEC.	Included in Georgia Test. Related to exceptions 16 and 124.
7	63	TVV8 (5/24/01)	The BellSouth ECTA system failed to appropriately process "enterTroubleReport" transactions.	Included in Georgia Test (M&R2) (Similar issue (different error code) to Exception 15 closed June 16, 2000.
8	84	TVV4 (07/10/01)	BST failed to use the proper codes when provisioning switch translations.	See Georgia Exception 76.
9	96	TVV11 (08/08/01)	BST delivered resale bills reflecting incorrect usage charges	Similar to Exception 91 in Georgia

Open Observations and Exceptions in Florida Third Party Test

10	101	PMR-5 (8/24/01)	KPMG cannot replicate the values in the Total Service Order Cycle Time report for January 2001.	Formerly Observation 57
11	112	TVV4 (10/01/01)	BellSouth's systems or representatives have not consistently provisioned service and features as specified in orders submitted by KPMG.	See Georgia Exception 76.
12	114	PMR-4 (10/05/01)	BellSouth incorrectly excludes data between the BARNEY Snapshot database and NODS stages of the PMAP process for FOCS for June data.	FOC data integrity issues were raised in Exception 131.
13	120	PMR4 (11/13/01)	BellSouth incorrectly excludes data between the BARNEY Snapshot database and NODS stages of the PMAP process for fully and partially mechanized orders for the % rejected service requests (non-trunks).	Data integrity issues were raised for this measure in exception 131. See STP PMR4-3-1 and PMR4-3-2.

Open Observations and Exceptions in Florida Third Party Test

Open Observations in Areas Tested in Georgia but No Exception Issued

	Observ.	Test #	Description	Comments
1	45	TVV-4 (3/6/01)	BST returned FOC frame due times that do not match the regular hours for provisioning.	In scope of Georgia Test.
2	77	TVV-1 (5/18/01)	BellSouth does not provide sequential telephone numbers as requested using the Telephone Number Availability Query (TNAQ)	In scope of Georgia Test.
3	86	PPR-1 (6/29/01)	The BST Release Management Team does not provide all prioritized change requests to the BellSouth IT Team for development and implementation.	In scope of Georgia Test. Extent of implementation review unclear.
4	102	TVV-6 (08-07-01)	BST ECTA system failed to process the MLT as designed	In scope of Georgia Test.
5	107	TVV-8 (8/16/01)	BST ECTA system failed to appropriately process "cancel Trouble Report" transactions	In scope of Georgia Test. (See M&R 2-1-5)
6	116	PPR1 (9/05/01)	BST did not follow guidelines for notification of changes to business rules as defined in the change control process	In scope of Georgia Test. (See CM-1-1-6))
7	118	PMR-3 (9/6/01)	KPMG has discovered that BST has no documented process or control group for monitoring open change requests in Team Connection.	In scope of Georgia Test. (See PMR-3)
8	124	PPR1 (10/12/01)	BST failed to follow the documentation defect procedures as detailed in the BST change control process document.	In scope of Georgia Test--Extent of implementation review unclear.
9	140	PPR1 (11/13/01)	BellSouth is not classifying Change requests as defects in accordance with the BellSouth definition of a defect.	In scope of Georgia Test--Extent of implementation review unclear.

Open Observations and Exceptions in Florida Third Party Test

Open Exceptions in Areas Tested in Georgia, but No Exception Issued

	Exception	Test #	Description	Comments
1	12	PPR-1 (2/14/01)	BST does not adhere to the procedures for System Outage established in the BST change control process.	In scope of Georgia Test.
2	35	PPR-14 (3/21/01)	BST processes for responding to customer requests for earlier appointments differs between retail and wholesale centers, resulting in disparity of service.	In scope of Georgia Test.
3	44	TVV-11 (4/4/01)	BST issued CABs bills that reflect incorrect quantities of switching and transport usage.	In scope of Georgia Test.
4	60	TVV-11 (5/21/01)	BellSouth failed to cease billing on disconnected auxiliary lines.	In scope of Georgia Test
5	76	TVV-4 (6/28/01)	BellSouth failed to provision disconnect orders properly with the expected intercept recording message.	In scope of Georgia Test.
6	82	TVV-4 (7/11/0)	BellSouth's systems have not updated the directory listings databases on the completion date of the completion notice.	In scope of Georgia Test.
7	83	TVV-10 (7/10/01)	BellSouth delivered duplicate DUF records.	In scope of Georgia Test.
8	88	PPR-1 (07/20/01)	BST Change Control Process does not allow CLECs to prioritize all Change Requests that affect CLEC business.	In scope of Georgia Test.
9	106	PPR-1 (8/29/01)	The BellSouth IT Team does not have criteria to develop the scope of a Release Package.	In scope of Georgia Test.
10	111	TVV-11	BellSouth's policy of retaining resale call detail for 30 days after the bill period is inadequate for bill	In scope of Georgia Test.

Open Observations and Exceptions in Florida Third Party Test

			reconciliation and claims investigation.	
11	119	PMR3 (11/12/01)	KPMG has discovered that BST is not adhering to the documented metrics change control process for tracking changes in TeamConnection.	Team Connection functions formerly conducted using Issue Tracker. Formerly observation 126.

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October 23, 2001

Ms. Lisa Harvey
Division Regulatory Oversight
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 235D
Tallahassee, FL 32399-0865

Dear Ms. Harvey:

This letter is in response to the Florida Public Service Commission's Staff request for KPMG Consulting to provide a recommendation regarding the inclusion of BellSouth's new UNE billing solution in the Third-Party OSS Test. The remainder of this letter details the Background, Issue, Analysis, Reporting Options, Evaluation and Recommendation.

Background
The Florida Master Test Plan (MTP) directed the evaluation of BellSouth's billing systems, including bill accuracy (validation), usage accuracy, and adequacy of billing processes. KPMG Consulting has been engaged in billing testing since the fall of 2000. Several areas of billing analysis have been completed since that time. Some tests, most notably the usage billing tests, have significant issues which are in the process of resolution. During the week of October 1, 2001, BellSouth confirmed that new UNE billing elements will be rolled out in Florida on December 14, 2001. The Florida OSS Evaluation is currently scheduled to end on December 16, 2001.

Issue
Should the new UNE billing changes be tested and if so, should the test results be included in the OSS Evaluation Final Report?

Analysis
Based on information provided by BellSouth, KPMG Consulting believes that elements of bill validation, usage, and process tests associated with changes in the UNE billing systems require additional testing. KPMG Consulting also believes this testing to be within the scope of the OSS Evaluation activities directed by the MTP. If testing were to occur, it would begin in November 2001, and if no substantial issues arise, finish in March 2002.

Reporting Options
There are two primary options for reporting the results of the UNE tests recommended above:

A) Include the additional UNE billing test results as part of the Florida OSS Evaluation Final Report.
B) Separate the additional UNE billing tests from the Florida OSS Evaluation Final Report. The Final Report would include all other OSS Evaluation results, except those for the changed UNE billing elements. A separate report would be presented upon completion of the additional UNE billing testing.

Evaluation

Option A – Include the additional UNE billing test results as part of the Florida OSS Evaluation Final Report

Benefits:
a. Florida OSS Evaluation Final Report is an all-inclusive document.
b. Any problems discovered in the additional UNE bill testing related to other test areas can be addressed within the 271 process.

Risks:
a. As the test lengthens, all tests results begin to age. As the test results age, KPMG Consulting's confidence that the results represent current operations decreases.
b. The UNE billing modifications may not be implemented on schedule, or significant issues may be discovered, lengthening the entire test past Spring 2002.

Option B – Separate the additional UNE billing test reporting from the Florida OSS Evaluation Final Report

Benefits:
a. Ensures that majority of the test results do not age significantly.

b. Keeps issues with the additional UNE billing tests from drawing out the other parts of the OSS Evaluation process.

Risks:

a. The Florida OSS Evaluation Final Report is not all-inclusive.
b. The Florida OSS Evaluation Final Report presents an incomplete record on billing.
c. Issues discovered in non-UNE areas during the additional UNE billing tests cannot be addressed in the normal OSS Evaluation process.

Recommendation

KPMG Consulting recommends that the Florida Public Service Commission pursue testing of the new UNE billing elements. In KPMG Consulting's opinion, the risk of other test elements aging outweighs other considerations. Therefore it is KPMG Consulting's recommendation that the new UNE billing testing results be separated from the Florida OSS Evaluation Final Report.

Very truly yours,

KPMG Consulting

David B. Wirsching, III
Managing Director

cc: Mr. Walter D'Haeseleer, Florida Public Service Commission
Mr. Milton McElroy, BellSouth Telecommunications, Inc.
Mr. Marshall Criser, BellSouth Telecommunications, Inc.
Ms. Maryrose Sirianni, BellSouth Telecommunications, Inc.
Ms. Kathy Wilson-Chu, BellSouth Telecommunications, Inc.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of:	
Investigation into Development of Electronic Interfaces for BellSouth's OPERATIONAL SUPPORT SYSTEMS	Docket No. 8354-U

Hearing Room 110
244 Washington Street
Atlanta, Georgia

Tuesday, May 8, 2001

The above-entitled matter came on for hearing pursuant to Notice at 10:00 a.m.

BEFORE:

LAUREN MCDONALD, JR., Chairman
STAN WISE, Vice Chairman
ROBERT BAKER, Commissioner
ROBERT DURDEN, Commissioner
DAVID BURGESS, Commissioner

* * *

MR. LEMMER: Thank you, Commissioner, no.

COMMISSIONER BURGESS: Okay. Thank you. With that we will proceed.

FURTHER CROSS EXAMINATION

BY MR. LEMMER:

Q Gentlemen, change management. So we're on Section 8 of the report. Describe briefly for me what -- when we talk about change management in the context of Section 8, what are we talking about?

A (Witness Weeks) I think you could characterize change management as a process test as opposed to some sort of transaction test. It is attempting to determine whether or not the practices in place by the company that govern how it does change management changes of its interfaces visa a via the interface specifications and what the capabilities of those systems are get noticed out to parties and the process surrounding defining what those would be, when they will take place, how the -- the form of providing documentation about those changes to the interface and those sorts of things.

Q What is the -- in your opinion, what is the importance of providing documentation to CLECs about changes?

A (Witness Weeks) If CLECs are going to -- if the ILEC is going to change its interface and the CLECs are to

Q Well, in fact, BellSouth knew its actual system, Encore, couldn't pass the volume test, correct?

A (Witness Weeks) I wouldn't be able to say yes or no to that.

Q You would agree that BellSouth indicated to you that it's production system could not handle the volume anticipated in these volume tests?

A (Witness Weeks) They represented to us that they did not believe that their production system would be able to support those volumes, but I don't know that that was based on empirical evidence. I don't know. You would have to ask BellSouth.

Q Do you know any reason why BellSouth couldn't simply have improved their production system to handle the volume tests?

A (Witness Weeks) They could have done so. The reasons they gave for doing that were mostly based upon cost.

Q They did not want to spend the money it would take to bring their system up to level it would need to be to pass the volume test?

A (Witness Weeks) That was the representation that was made to us.

Q Now in setting up RSIMMS, BellSouth didn't simply duplicate the Encore system, did it?

A (Witness Weeks) Right.

Q -- do you agree with that?

A (Witness Weeks) I agree.

Q Corresponding machines in RSIMMS had -- one had four CPU's and four gigabits and one had two CPUs and one gigabit, correct?

A (Witness Weeks) That's correct.

Q And when they're discussing the relative computing power of RSIMMS versus BellSouth's actual production system, it states that RSIMMS, in this application, has an almost 100 percent greater computing power, is that correct?

A (Witness Weeks) Correct.

Q Now did you agree with BellSouth's decision to run the volume test in RSIMMS as opposed to Encore -- opposed to its production system?

A (Witness Weeks) Well I pointed out that running the production tests -- excuse me, running the volume tests in something other than the production environment was not a strong a record as running that same test in the production environment, and that's what gave rise to the production volume tests.

Q Well, in fact, did you put language in the RSIMMS' portion of the report that essentially distanced KPMG from much of what was contained in that report talking about the two different systems?

could have took that money and enhanced the production environment and tested it instead.

COMMISSIONER DURDEN: And now they've got to spend that money to upgrade again.

WITNESS WEEKS: It's my understanding that the RSIMMS environment already existed. Now whether it existed in its exact form, I couldn't comment on. But it wasn't created solely for the purposes of passing the volume test. There's also one other concern that all ILECs express when you talk about running the volume test in production, and that is if it fails and there's significant problems, real customers, real CLECs, real orders, real consumers in the state of Georgia would have been impacted, and the company was concerned about that as well.

MR BARBER: May I follow up on a couple of those questions, sir?

COMMISSIONER BURGESS: Go ahead.

BY MR. BARBER:

Q In fact, you can tell us of no other state in which you performed these tests in an artificial environment instead of the production system, is that correct?

A (Witness Weeks) There are none To my knowledge.

Q Let me follow up on Commissioner Durden's questions to you. Would you agree that the volume tests that you perform do not prove that BellSouth's regular

production system, the ones that the CLECs will have to use, can currently pass the volume tests ordered by this Commission?

A (Witness Weeks) The work that we did would not demonstrate either way whether they could or couldn't.

Q And would you agree that you have performed no test that assures that BellSouth could increase the capacity of Encore to a level necessary to pass the volume test?

A (Witness Weeks) We have done no demonstration that that's true.

Q Have you done any tests to prove that during the process of upgrading Encore CLEC's operations would not be impacted?

A (Witness Weeks) We've done no work on that at all.

Q And have you done any tests that would show that the increased capacity of Encore can accommodate the real world transaction mix that'll be presented to it?

A (Witness Weeks) Because we didn't do any work --

COMMISSIONER BURGESS: Now you just asked a good question. When will it be presented to them? That's what we've been trying to get a handle on -- this Commission. It's one thing to build it and they come, it's another thing to build it and they don't come. We've been in that -- you hit right on the head, when we get to it. I want to know --

Q Give me a second to catch up with you, Mr. Weeks.

A (Witness Weeks) Okay. Actually, I believe the table starts one page earlier than that, Roman V-J-7.

Q V-J-7. Could you give us a percentage of the volume run in Encore production, volume tests relative to the volume run in RSIMMS? Because I don't believe...

A (Witness Weeks) We're going to reference both and try to tell you that.

Q Okay.

(Brief pause)

A (Witness Frey) The production volume test pre-order volumes were 24,594; the order volumes were 7,429.

Q And this is in Encore?

A (Witness Frey) That's correct.

A (Witness Weeks) Yes.

A (Witness Frey) For the normal volume test in RSIMMS there were 118,000 pre-orders, and 35,000 orders.

A (Witness Weeks) Roughly five times, just real round numbers.

Q Thank you very much, Mr. Weeks. I was doing some quick calculating in my head.

Let me go back to the assumptions briefly. Let me ask Mr. Ullal -- or Mr. Weeks, you can answer this if you know -- how did he derive the assumptions that we discussed a few minutes earlier?

C E R T I F I C A T E

I, William L. Warren, do hereby certify that the foregoing pages represent a true and accurate transcription of the events which transpired at the time and place set out in the caption, to the best of my ability.

William L. Warren

William L. Warren

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

IN THE MATTER OF:
Docket No. P-55, Sub 1022
Application of BellSouth 5 Telecom
to Provide In-Region InterLATA
Services Pursuant to Section 271
of the Telecommunications Act of 1996 7 ~~~~~~~

CONFIDENTIAL DEPOSITION OF

MILTON McELROY, JR. P.E.

October 8, 2001
9:10 a.m.

675 West Peachtree Street
Atlanta, Georgia

Robin K. Watkins, CCR-B-1936, RPR

APPEARANCES

Appearing on behalf of BellSouth:

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On Behalf of the Tennessee Regulatory Staff in Nashville:

Carsie Mundy (via telephone)

Colleen Edwards (via telephone)

Also Present:

Sharon Norris, Sen Consulting

0177

Florida than they tested in Georgia?

A. For change management?

Q. Yes.

A. No.

Q. Have they opened exceptions in Florida in change management on issues that were not opened as exceptions in Georgia?

A. The change management, its process itself is an ever evolving process. KPMG has opened issues, exceptions, observations as a part of the Florida test. KPMG in Georgia opened exceptions on this test, or this component of the test as well.

Some of those, a couple of those items have been the same, around carrier notification timeliness. Some things have been different. They're different -- KPMG is testing the change management process at different points in time.

Q. Okay. You've raised carrier notification timeliness. Was that the subject of an exception in both Georgia and Florida?

A. As I recall, it was, yes.

Q. Okay. And if carrier notification timeliness was an exception in Georgia, and it

important to any commission, there's now measures in place that will encompass that and appropriately measure, allow the commissioners to appropriately measure and monitor that process for posting of carrier notification letters.

Q. The carrier notification timeliness example, okay, only because that's an easy to understand example, I think. The exception was issued in Georgia why?

A. I would have to go back and look specifically at the exception. I don't recall the specific details.

Q. Well, let me ask it a different way then. Do I understand your answer to be saying that the exceptions that are being opened now in Florida are exceptions on processes that didn't exist when they conducted the Georgia test?

A. What I can tell you is that that process has changed over time and will continue to change. When the Georgia test began, we didn't have the change control process as defined today. We had a predecessor to it.

And I believe its acronym -- I don't recall what it means, but it was the EICP

0180

process or something. It was more specific to the electronic systems. But, you know, so that change control process in and of itself continues to evolve.

Q. So what is being evaluated in Florida is the change control process that currently exists; is that correct?

A. Yes.

Q. And what was evaluated in Georgia is some predecessor process?

A. Well, it's an earlier version of that process. There was a predecessor process that was initially evaluated. The change control process in and of itself that we call the CCP Document, Change Control Process Document, I don't recall the exact dates, but it was developed and put in place at some point during the Georgia test.

And that process and that documentation have continued to evolve and do so to this day. In fact, we've got one of the open exceptions in Florida now is waiting upon Appendix D to that document for the CS to vote upon some changes, to modify some language. So that may continue to evolve.

PLACE: Dobbs Building, Raleigh, North Carolina
DATE: November 1, 2001
DOCKET NO.: P-55, Sub 1022
TIME IN SESSION: 9:15 A.M. TO 12:35 P.M.

BEFORE: Chair Joanne Sanford, Presiding
Commissioner J. Richard Conder Commissioner
Robert V. Owens, Jr. Commissioner Sam J.
Ervin, IV Commissioner James Y. Kerr, II

IN THE MATTER OF:
Application of BellSouth Telecommunications Inc.
to Provide in-Region InterLATA Service
Pursuant to Section 271 of the
Telecommunications act of 1996

VOLUME 6

A P P E A R A N C E S :

FOR BELLSOUTH TELECOMMUNICATIONS, INC.
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NORTH CAROLINA UTILITIES COMMISSION

that we have shared with the Georgia Commission, which we felt, given what their objectives were, some of our thoughts about what, you know, they might should consider for testing and--

COMMISSIONER ERVIN: And were these just random thoughts, or did you sit down and make a complete systematic list or what?

THE WITNESS: No, we did not do a complete systematic, you know, these are all the possible things you could ever think about testing.

COMMISSIONER ERVIN: That was not done?

THE WITNESS: That--that was not done.

COMMISSIONER ERVIN: Okay. Well, tell me what was--

THE WITNESS: What we were trying to do was to respond to mostly the Strickland letter and--and help them think about those issues. I think that in terms--if the question you're asking me is how

should you guys go about thinking abut it--about the Georgia record sitting here in another jurisdiction, I think that, in the first place, as we say in our report, we never intended the Georgia report to be used by other than the Georgia Commission. That's clear on the first page on our disclaimers. And so it gives us a little bit of

cause for pause that it's being used in another jurisdiction in a way that we didn't intend for it to be used and in a way that we explicitly tried to keep from happening.

But given that that's happened, I think you need to make your own assessment of the areas that weren't evaluated in the Georgia test. And it's a fairly straight forward mapping exercise, which I'm sure others have already done for you.

COMMISSIONER ERVIN: And if they haven't, I'm fairly confident that they will.

THE WITNESS: And look at those areas for which there was no record developed in Georgia. And ask yourself whether there are areas there that you feel, as a Commission, that you would like to have some record on. And I--I would remind the Commission that there's three legs to this stool. Any time you look at a record, there is what the

third-party independent tester observed in the course of their actions. There is what the company puts forward as its commercial experience all day, every day, in its advocacy case. And then there's what the CLPs put forth as their experience all day, every day. And I think, you know, you will look at all three of those. That the third party

test isn't the be-all-end-all. It's part of the equation. It's not the entire equation.

COMMISSIONER ERVIN: Certainly. But what--to try to bring this aspect of our conversation to a conclusion, I'm hearing you tell me that, given the circumstances under which the test was designed and conducted in Georgia, that while you and your colleagues at KCI had input into the design, that it was not within your control. And that you're not making a representation to us, one way or another, as to the completeness; is that a fair understanding of what you're telling me?

THE WITNESS: I think that's a fair understanding. And, you know, I'll make one other assessment, which is, you know, we can't tell you, because we haven't done any work, how much of the Georgia systems and processes and methods and documentation, and all of that stuff, apply to this jurisdiction. We don't know the answer to that question.